# “Outlining a Sustainability Concept in the Tea Industry Based on the Modern Slavery Act”

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**Submitted to**

**Prof. Dr. Willi Darr**

**Alfons-Goppel-Platz 1**

**95028, Hof**

**Germany**

**Submitted by**

**Soham Gandhi**

**Alte Plauener Straße 3**

**95028, Hof**

**Germany**

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# Abstract

This thesis examines how the tea industry can move towards a more sustainable sourcing model that not only meets the requirements of the UK Modern Slavery Act (2015) but also addresses the reality of labor exploitation in supply chains. The research combines literature insights with a case study of Twining's in Assam, where workers' experiences often reveal a gap between company promises and actual change. Alongside this, a comparative look at companies such as Unilever, Aldi, and Tesco shows the mixed progress of different actors—some investing in audits and partnerships, while others rely on surface-level compliance.

Analysis suggests that while the MSA has pushed businesses to report and increased awareness at a global level, its lack of enforcement and the complexity of supply chains limit its impact. High audit costs, weak local governance, and the absence of strong worker voices remain major barriers. The discussion, therefore, highlights both business implications—such as the need for fairer contracts and better traceability—and policy-level reforms that could strengthen accountability.

To move beyond these challenges, the thesis suggests a simple three-pillar model built around compliance, empowerment, and shared value. The idea is not just to meet legal requirements but to make sure that workers see real improvements in their lives. This model gives companies a clearer path to combine reporting duties with genuine responsibility on the ground. In this way, the study adds to wider debates on corporate accountability while also pointing to practical steps that can help the tea industry build supply chains that are both fair and sustainable.

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# List of Abbreviations

- **ACMS –** Assam Chah Mazdoor Sangha
- **CAG** – Comptroller and Auditor General (India)
- **CSR** – Corporate Social Responsibility
- **CSDDD** – Corporate Sustainability Due Diligence Directive (EU)
- **ETP** – Ethical Tea Partnership
- **IDH** – Sustainable Trade Initiative (Dutch: Initiatief Duurzame Handel)
- **MSA** – Modern Slavery Act (UK, 2015)
- **NGO** – Non-Governmental Organization
- **TCNA** – Twining's Community Needs Assessment
- **TISC** – Transparency in Supply Chains (reporting requirement under MSA)
- **UNGPs** – United Nations Guiding Principles on Business and Human Rights

# 1. Introduction

## 1.1 Background

The Tea Industry: A Global Overview

The tea industry is a traditional and valued area of farming around the world, supplying people with a daily beverage and greatly boosting economies. After water, tea is the drink consumed around the globe the most and it has a rich history in cultures, trade and settlement history. Over a long time, tea has gone from being a rare luxury to a product that almost everyone can afford and today it brings in billions of dollars worldwide (Ono, 2021)[1]. India, China, Kenya and Sri Lanka are the leading producers of tea and between them, they account for most of the tea exported around the world. These areas grow tea mainly to sell overseas, and many people count on employment from these estates.

Even though tea is consumed around the world, the industry suffers from major ethical and social-economic issues largely because of the large amount of manual work involved. Because tea is picked by hand, most picking tasks are done by women and those with low incomes under unsafe conditions. Many plantation workers are paid far below the legal standard, and they have problems accessing basic needs such as healthcare, education, providing clean water and quality housing. This happens more often in rural India and East Africa's regions, where people are poor, labor laws are weak, and government control is lacking (Li et al., 2024)[2]. Many studies also reveal that women and children often face discrimination, harm and unfair labor on tea estates.

One of the core challenges in the tea industry is the persistent disagreement and lack of accountability around the issue of fair wages. While stakeholders recognize that workers often earn wages too low to meet basic living standards, especially women, responsibility for solving the problem is frequently shifted. Brands emphasize compliance with national laws and claim limited power due to competitive price pressures and undefined living wage standards. Producers argue they follow legal wage processes and offer additional social support but highlight the high cost of labor and tight profit margins. NGOs and trade unions point out that workers, particularly women, lack a voice in wage decisions and often face poor working

[1] Ono, 2021
[2] Li et al., 2024

conditions, while multinational companies continue to profit from their labor. They argue that collective bargaining is the most sustainable way to ensure a living wage but note that such efforts are often obstructed by unstable employment and restrictive corporate practices. This fragmented accountability across the supply chain prevents meaningful progress on wage reform and keeps many workers in vulnerable situations (IDH, 2014)[3].

It is a main challenge in the industry that information is kept secret along the supply chain. There are many players involved in bringing tea to consumers, making it hard to tell where it comes from and who to blame for wrongdoings. So, even famous brands might not recognize the full scale of labor problems in their supply chains. Because tea supply chains are so unclear and fragmented, it is difficult to set up adequate monitoring, auditing and compliance systems. Lately, people and consumers have put more emphasis on understanding where tea is sourced from. Because of the Modern Slavery Act (2015), groups must now state publicly what measures they are using to prevent forced labor and human trafficking. Many companies now rely on certificates like those from Fairtrade, Rainforest Alliance and Ethical Tea Partnership to show they are following ethical and sustainable ways of working. However, people point out that these efforts have low coverage, differ widely in standards and depend too much on information given by producers.

While progress has been made with ethics in sourcing such progress is still slow. Since companies feel pressure to stay competitive, they are less motivated to focus on fair labor practices and open matters (Kanu et al., 2025)[4]. Going forward, dealing with these problems calls for the involvement of governments, businesses, NGOs and consumers. Applying blockchain to guiding traceability, providing a fair deal for suppliers and improving labor rights enforcement is key to turning the tea industry into one that is ethical, sustainable and open to everyone.

Consequently, the UK Modern Slavery Act 2015 was created to help stop human trafficking, forced labor and more types of modern slavery occurring in commercial companies and supply chains. If a business has a turnover of £36 million or more in the UK, it is required to

[3] IDH, 2014
[4] Kanu et al., 2025

produce annual statements showing how it is dealing with the risk of modern slavery in its supply chain.

Operating through several levels and in many parts of the world, tea companies face challenges as well as opportunities in following such rules (Liu, 2020)[5]. Most brands buy tea using intermediaries, so it becomes tough to check the location of their products and working conditions on the plantations (Wang et al., 2025)[6]. Thus, the Act has made companies more transparent, led them to invest in independent reviews, directly communicate with suppliers and connect with organizations and certifiers like Fairtrade and Rainforest Alliance regarding sourcing.

Problem Statement

Despite global attention and laws like the UK Modern Slavery Act, the tea industry continues to face serious challenges in labor rights, wage fairness, and supply chain transparency, leaving workers — especially women — vulnerable to exploitation and poor living conditions (IDH, 2014)[7].

Since there is little transparency in supplying tea, unethical behaviors remain hidden. Because they work with third-party suppliers and brokers, international tea brands end up disconnected from the point of tea production and where it is finally sold (Lloyd et al., 2025)[8]. Because of this separation, we often do not know how tea is grown and harvested. Furthermore, the global tea industry is affected by a lack of attention to smallholder farmers and their tea production which means many remain invisible during official checks and certification. If companies cannot monitor their supply chains and personally manage sourcing, they have difficulty ensuring no human rights abuses are involved.

Because of laws such as the UK's Modern Slavery Act and other similar international frameworks, a few companies have begun publishing transparency statements and auditing their suppliers. Nevertheless, the way companies report is not always proper, and many reports miss out on highlighting important actions they have taken (Ebinger et al., 2020)[9]. Trying to meet the minimum required standards alone is insufficient; it takes a real effort

[5] Liu, 2020
[6] Wang et al., 2025
[7] IDH, 2014
[8] Lloyd et al., 2025
[9] Ebinger et al., 2020

with better tracking, joining local organizations, adopting fair trade and offering workers more opportunities. If these actions are not enforced, labor abuse and poor supply processes will damage the tea industry's ethics.

### 1.2 Research Question

The main topic of this academic thesis is How can the tea industry develop a sustainable sourcing model that addresses labor exploitation and ensures compliance with the Modern Slavery Act?

### 1.3 Objectives

The objective of this thesis is to explore the ethical and labor challenges within the global tea industry and to provide practical recommendations for developing a sustainable sourcing model. This model aims to address labor exploitation and align with the requirements of the UK Modern Slavery Act, with a focus on enhancing transparency, promoting fair labor practices, and strengthening accountability across the entire supply chain.

### 1.4 Structure

In this thesis, to answer the research question I will use the following approach: firstly, I will see the current state of procurement management and supply chain practices within the tea industry. Following this, I will consider the perspectives of key stakeholders involved in the industry to understand their roles, challenges, and responsibilities. After a comprehensive evaluation of these elements and their implications, I will provide targeted recommendations for the tea industry that align with the principles of the Modern Slavery Act. Finally, the study will conclude with reflections on the potential for creating a more ethical and sustainable sourcing model.

# 2. Literature Review

My thesis is structured around two core components: Subject and Focus. The Subject explores the structure and operation of the global tea supply chain, from cultivation to consumer, while addressing key challenges such as labor exploitation and transparency. The Focus centers on the UK Modern Slavery Act 2015, examining its legal framework, its implications for the tea industry, and its role in promoting ethical and sustainable sourcing practices.

## 2.1 Subject: Tea Industry

### 2.1.1 Global Tea Supply Networks: A Study of Processes and Stakeholders

The tea industry follows a complicated sequence starting from production at tea plantations and completing as consumers obtain the final tea product. Indian, Chinese, Sri Lankan and Kenyan regions maintain tea plantations that agricultural workers supervise from tea bush cultivation. The tea leaves move to their mature stage before agricultural workers perform physical collection or machine harvesting according to regional standards and market requirements. Different processing stages after leaf collection involving withering, rolling, fermenting (in some cases), drying as well as sorting create essential conditions for developing the characteristic flavor within finished tea products (Ahmad et al., 2024)[10]. At the conclusion of the processing stage tea goes either into direct packing at its place of production or moves onward to blending facilities for combining diverse tea types to meet particular flavor requirements. After blending operations, the packaged tea reaches distribution points which include wholesalers and retailers and branded supermarkets.

The tea supply chain management requires businesses to synchronize multiple connected operations and stakeholders to transport tea between farms and consumers. The supply chain maintains its foundation through tea growers responsible for turning similarly situated tea leaves into produce based on climate situations and farming procedures in their areas. The processed leaves enter facilities to conduct necessary stages which include withering and rolling and oxidation for black tea and drying and grading operations. The processing stages are managed by tea estates together with third-party processors under quality control team supervision to protect flavor and maintain consistency. The finished tea moves to blending and

[10] Ahmad et al., 2024

packaging plants where various tea grades are combined for different brand mixed recipes. The tea packaging process ends when distributors and exporters take charge of the product distribution through international boundaries before it reaches domestic markets. The chain concludes with retailers who include supermarkets and specialty tea shops together with e-commerce platforms that enable product availability to consumers. Farmer and laborers alongside processing entities and logistics suppliers and auditors and retailers make up all the key personnel operating within the supply chain.

Stakeholders in the tea supply chain span a diverse range of actors, each playing a distinct role in shaping the production, processing, and distribution of tea. At the foundation are **smallholder farmers and estate owners**, who are responsible for cultivating tea bushes and managing harvest schedules in accordance with seasonal and climatic variables. In regions like Assam (India), Nuwara Eliya (Sri Lanka), and Kericho (Kenya), smallholders contribute significantly to national outputs while operating with minimal institutional support. These producers often face systemic challenges including price volatility, limited bargaining power, and restricted access to credit, making them particularly vulnerable to exploitation and market shocks (van der Wal, 2008; FAO, 2023)[11]. Estate-based production, on the other hand, tends to be more formalized, offering consistent employment to plantation workers but also facing criticism for poor labor conditions and wage disparity (Baruah, 2022)[12].

Following production, **processing entities and quality control teams** play a critical role in transforming raw tea leaves into marketable products. These include both estate-owned factories and independent processors who undertake withering, rolling, fermenting, and drying operations. This stage involves both skilled labor and technical oversight to maintain flavor consistency, grading standards, and hygiene compliance. Oversight by **certifying bodies** (e.g., Rainforest Alliance, Fairtrade) is increasingly vital here, as consumer demand rises for ethically certified and traceable tea. Meanwhile, **logistics providers** manage the movement of tea through domestic and international supply chains. They coordinate transportation, manage warehousing, and handle export documentation — tasks essential to the global reach of companies like Unilever and Tata Consumer Products (Ethical Tea Partnership, 2023)[13].

[11] van der Wal, 2008; FAO, 2023
[12] Baruah, 2022
[13] Ethical Tea Partnership, 2023

At the upper end of the supply chain are **retailers, exporters, and multinational brands** who interface directly with end consumers. These stakeholders are not only responsible for product marketing and distribution but also for ensuring regulatory compliance, including adherence to the UK Modern Slavery Act and other sustainability frameworks. As public scrutiny increases, companies are expected to disclose sourcing practices and labor standards throughout their supply networks. Retailers such as Twinings and Lidl, for example, have published modern slavery statements and implemented third-party audits to verify ethical sourcing (Twinings, 2023)[14]. Civil society organizations and NGOs also act as critical watchdogs, pressuring corporations to reform exploitative practices and enhance transparency across operations.

### 2.1.2 supply chain process: plantation, picking, production (rolling, drying), blending, and packaging

The supply chain of the tea is a multi-stage complex process that converts green leaves into the drink millions of people consume daily around the globe. The first step is the plantation level where tea is grown in big estates or smallholder farmers mainly in the tropical and subtropical countries like India, Kenya, Sri Lanka, and China. The climate, soil, altitude and rainfall are important factors, which enhance the quality and flavor of the tea. Then there is picking stage after the careful cultivation and regular pruning (LeBaron et al., 2018)[15]. This is where experienced laborers pluck by hand the two leaves and a bud, the tenderest part of the tea plant and which are necessary to produce quality tea. It is a labor-intensive stage and it usually depends on a huge amount of labor force particularly in the nations where tea is a major factor in the economy.

After harvesting, the leaves are taken to production/ processing facility as fast as possible to avoid premature fermentation. The leaves are then withered to lower the moisture content, followed by rolling which twist and break the leaf cells to release vital enzymes and juices that add flavor. Next comes oxidation or fermentation- an important step which defines the type of tea (black, green, oolong). This is also allowed to proceed to the appropriate time, and arrested by drying or firing, which fixes the flavor and color. The tea so obtained is then graded- according to leaf size, shape, and quality. A portion of teas are sold immediately after this; however, a large portion are blended, with various grades/types being combined to produce a

[14] Twinings, 2023
[15] LeBaron et al., 2018

standard flavour profile to branded products (Adiaha, 2017)[16]. Lastly, the tea is packaged either as loose-leaf tea, tea bags or as ready-to-drink tea, and it is now ready to be distributed and sold. Every step in this chain is paramount to the end product upon meeting the expectations of the consumer in terms of taste, aroma and quality and a lapse or disturbance at any of the steps may have a drastic impact on the end product.

**Mention use of blockchain for traceability and sustainable certifications like *Fairtrade* and *Rainforest Alliance*.**

With the rise in the ethical sourcing and environmental sustainability consciousness among the global consumers, the tea industry is in the midst of revolutionizing, by applying technology and certification systems to enable the supply chains to become more open and sustainable. The introduction of blockchain technology is one of the most promising ones. In real time, Blockchain enables tracing and recording of all transactions and movements within the supply chain- plantation to packaging. Using this decentralized, tamper-evident digital ledger, businesses can offer complete traceability, allowing consumers to be sure that their tea is ethically sourced, with no labor exploitation and with environmental sustainability (Dyer, 2020)[17]. To take just one example, blockchain can be used to verify that a given batch of tea was grown on a certified organic farm in Assam, subjected to fair labor practices, and delivered to the factory without being commingled with uncertified leaves. Such a degree of traceability is also beneficial in assisting companies to achieve international compliance standards as well as ensuring a swift response by companies to disruption in the supply chain in cases of contamination.

Alongside, sustainability certifications, including Fairtrade, Rainforest Alliance, and UTZ, are becoming relevant. These certifications assure that the production of tea is carried out in compliance with certain standards associated with fair prices, safe working conditions, environment preservation, and community welfare. As an example, Fairtrade certification ensures that farmers receive a minimum price and provides premiums that can be used on social development projects, whereas the Rainforest Alliance concentrates on biodiversity, prevention of deforestation and climate resilience. These certifications are regularly reviewed and usually audited by a third party to ensure credibility and efficacy (Köhler et al., 2022)[18].

[16] Adiaha, 2017
[17] Dyer, 2020
[18] Köhler et al., 2022

They are not only helping to make the life of tea workers better and ensuring environmentally friendly methods of farming but are also becoming a selling point in an ever more ethical consumer market. The big tea retailers and brands place the certification labels on the packs to attract the socially conscious customers and to show their interests in being sustainable. Overall, the integration of contemporary technologies, such as blockchain, and well-established certification systems is assisting in transforming the conventional tea supply chain into an accountable, inclusive, and future-proof one.

### 2.1.3 Procurement in the Tea Value Chain: Direct, Indirect, and Sustainable Approaches

Procurement is the strategic referral to identification, acquisition and management of goods and services that an organization requires to perform efficiently. Procurement has a noble role in tea industry since it directly impacts the quality, cost and availability of final product. Procurement choices made from the raw tea leaf suppliers to the packaging material and transportation services affect each aspect of the tea value chain. An effective procurement maintains continuous supply of quality materials, maintains proper relations with the suppliers, and makes tea companies competitive both in the local and global market (Kihara et al., 2013)[19]. The procurement process in the tea industry is particularly vulnerable to other variables like weather, seasonality and demand in the market which makes it very crucial that a business integrates an effective and well-coordinated procurement process. In addition, sustainability, traceability and ethical sourcing are also responsible procurement practices gaining importance to consumers and other stakeholders. Procurement in the tea industry is broadly categorized into direct procurement and indirect procurement which have different and related purposes. Direct procurement deals with the material that is procured and goes directly into the production of the tea product. This mainly involves the procurement of tea leaves either by owned plantation, cooperatives or smallholder farmers. The companies can either attend tea auctions or make long-term agreements with farmers to guarantee the consistency of supply, quality management, and traceability (Mutavi, 2021)[20]. Other companies are also moving more to direct farmer outreach as a way to drive sustainable and ethical sourcing behaviors, thus ensuring growers receive appropriate compensation and

[19] Kihara et al., 2013
[20] Mutavi, 2021

conduct operations in a manner that is environmentally responsible. Indirect procurement on the other hand includes those goods and services that are not included in the finished tea product but are required to support operations and processes accordingly. That would be the purchase of fertilizers, pesticides, packaging materials such as boxes and sachets, transportation services, processing machinery, quality control machinery and even IT services and marketing services (Kipkorir et al., 2015)[21]. Although they are not seen in the final product, they play a very important role in ensuring efficiency in the production, safety of operations and brand identity. Efficient indirect procurement management serves to minimize cost of operations and enhance general business performance. Direct and indirect procurement need not use the same strategies or have the same relationships with suppliers, yet, in combination, they make the tea industry work (farm to cup).

Tea market is one of the most culturally and economically important agricultural products globally. India, China, Kenya, and Sri Lanka are among the leading tea-producing nations that have played a distinctive role in the production of tea in the world. India produces different varieties like Assam, Darjeeling, Nilgiri, etc. and provides quantity as well as quality. It ranks among the world producers and consumers of tea (Mutavi, 2021)[22]. China, which is said to be the home of tea, is the major producer of green tea and has a large variety of both traditional and specialty teas. Sri Lanka (Ceylon) has established a reputation on its aromatic black teas which are cultivated in highlands and are characterized by bright and bold flavor. On its part, Kenya is the leading black tea exporter and a major player in the European and Middle East market supplies.

In spite of these achievements, the international tea trade is constrained by some urgent issues, especially the ones concerning the labor regulations, unstable prices, and environmental damages. The exploitation of labor is also an issue of concern, particularly in areas where manual picking of tea is applicable and laborers receive very low wages. The majority of workers in tea plantations are women who have to endure poor working conditions, extended working hours, without access to health and education services (Kipkorir et al., 2015)[23]. Also, big buyers and retailers tend to dictate the price of tea in the world markets, which has resulted in reduced profit margins to the smallholder farmers. The problem of climate change has emerged as a major risk as well, in terms of yield, soil condition, and rainfall, in the hilly areas,

[21] Kipkorir et al., 2015
[22] Mutavi, 2021
[23] Kipkorir et al., 2015

where tea plantation is most suitable. These issues disturb the dire necessity of the fair trade policies, improved wage regulation, and sustainable tea farming in the global tea business.

**Highlight trends like digital tools in supply chain management and sustainable procurement practices.**

Over the past few years, one of the industries that have experienced an amazing change is the tea industry, under the influence of digital technologies and the trend of sustainability. Through digitalization, the supply chain, tea garden to the cup of the consumer, has new efficiencies and transparency. Blockchain, IoT (Internet of Things), and AI-based data analytics are some of the technologies that are increasingly being used in an effort to make the procurement more streamlined, enhance traceability, and eliminate delays (Mutai et al., 2024)[24]. As an illustration, blockchain enables businesses to trace the origin of tea leaves in real-time, making sure that the quality is controlled and the sourcing is ethical. The mobile apps can also help farmers by informing them of the weather conditions, market prices, and they can communicate directly with the buyers, thus eliminating their reliance on intermediaries.

At the same time, the global tea value chain experiences an emerging need in terms of sustainable procurement practices. Consumers are increasingly conscious about social and environmental implications of their retail therapy, so brands are prioritising environmentally friendly packaging, organic agriculture and carbon-neutral supply chains. Fair Trade, Rainforest Alliance and UTZ certifications are also becoming more demanded as evidence of ethical sourcing and environment responsibility (Goodburn et al., 2024)[25]. Big tea brands and multinationals are slated to lower their carbon footprints, shift to regenerative farming, and safeguard the livelihood of the tea workers.

Not only are these trends assisting companies to achieve their corporate social responsibility (CSR) objectives, but they are also aiding in achieving long-term cost reductions, brand patronage as well as adhering to international trade laws (Adebayo et al., 2024)[26]. Through the incorporation of digital technology and green initiatives in procurement and supply chain management, the global tea industry is in a better position to tackle the contemporary challenges as it establishes a more ethical and sustainable future. Both of these (technology and

[24] Mutai et al., 2024
[25] Goodburn et al., 2024
[26] Adebayo et al., 2024

sustainability) are slowly revamping the production, marketing, and consumption of tea in the global market.

### 2.1.4 Global Tea Industry Landscape: Production, Consumption, Trends, and Corporate Dynamics

Tea production is concentrated in a small group of countries that benefit from favorable agro-climatic conditions and long-standing cultivation traditions. As of 2022, China leads the world in tea production with approximately 14.6 million tonnes, representing nearly 49% of the global share. India follows as the second-largest producer with around 6.0 million tonnes (about 20%), while Kenya contributes about 2.34 million tonnes, making it the top producer in Africa. Other significant contributors include Sri Lanka, Vietnam, Indonesia, and Turkey, which collectively make up a substantial portion of the remaining global production (FAO, 2023)[27]. These countries form the backbone of the global tea supply chain and serve as critical nodes in both economic development and ethical labor concerns, especially under the purview of sustainability regulations like the Modern Slavery Act.

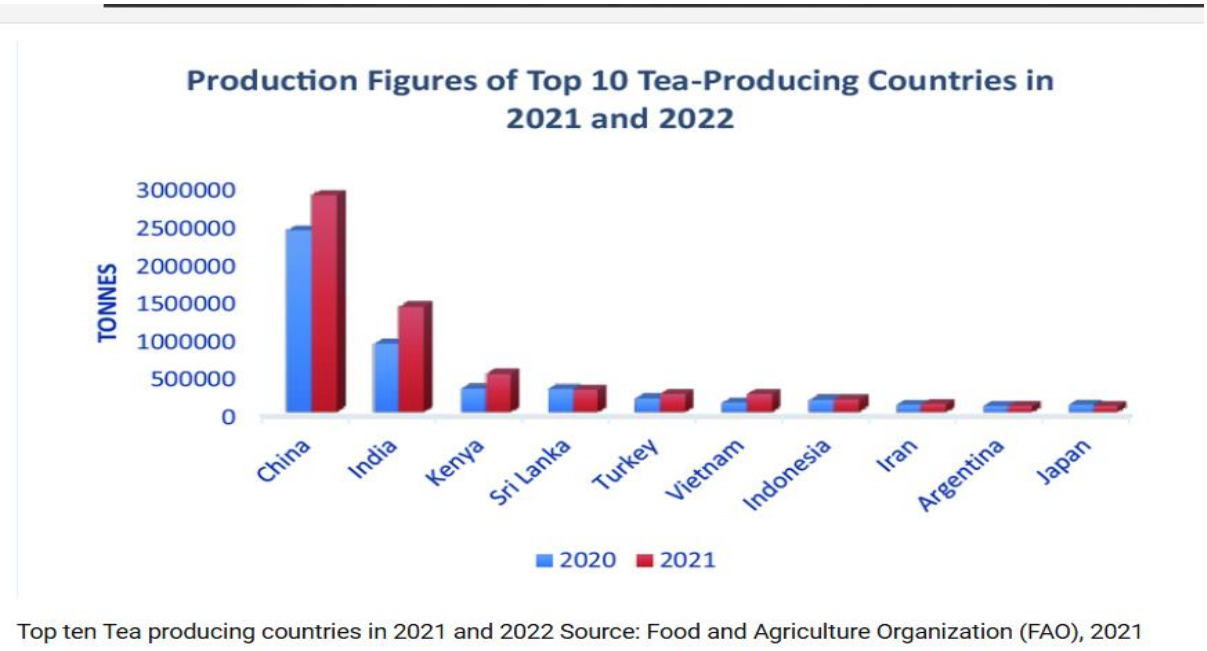


Figure 1. Tea-producing countries
Source: FAO, (2021). Food and Agriculture Organization of the United Nations. Tea Statistics. Retrieved from researchgate.net

[27] FAO, 2023

Tea consumption is both a cultural tradition and a large-scale commercial activity in various parts of the world. In terms of per capita consumption, Sri Lanka tops the global list with an average of 48 kg per person per year, followed by Argentina at 27.2 kg, and Turkey at 14.7 kg (Statista, 2024)[28]. These high figures reflect deep-rooted cultural practices where tea is consumed multiple times a day. On the other hand, countries like China and India dominate in terms of total consumption volume, due to their massive populations. For instance, China consumes over 3 million tonnes of tea annually, accounting for approximately 46% of global consumption, while India follows with more than 1.1 million tonnes (Our World in Data, 2024)[29]. Understanding consumption trends is critical for companies aiming to manage ethical sourcing and demand-driven sustainability strategies.

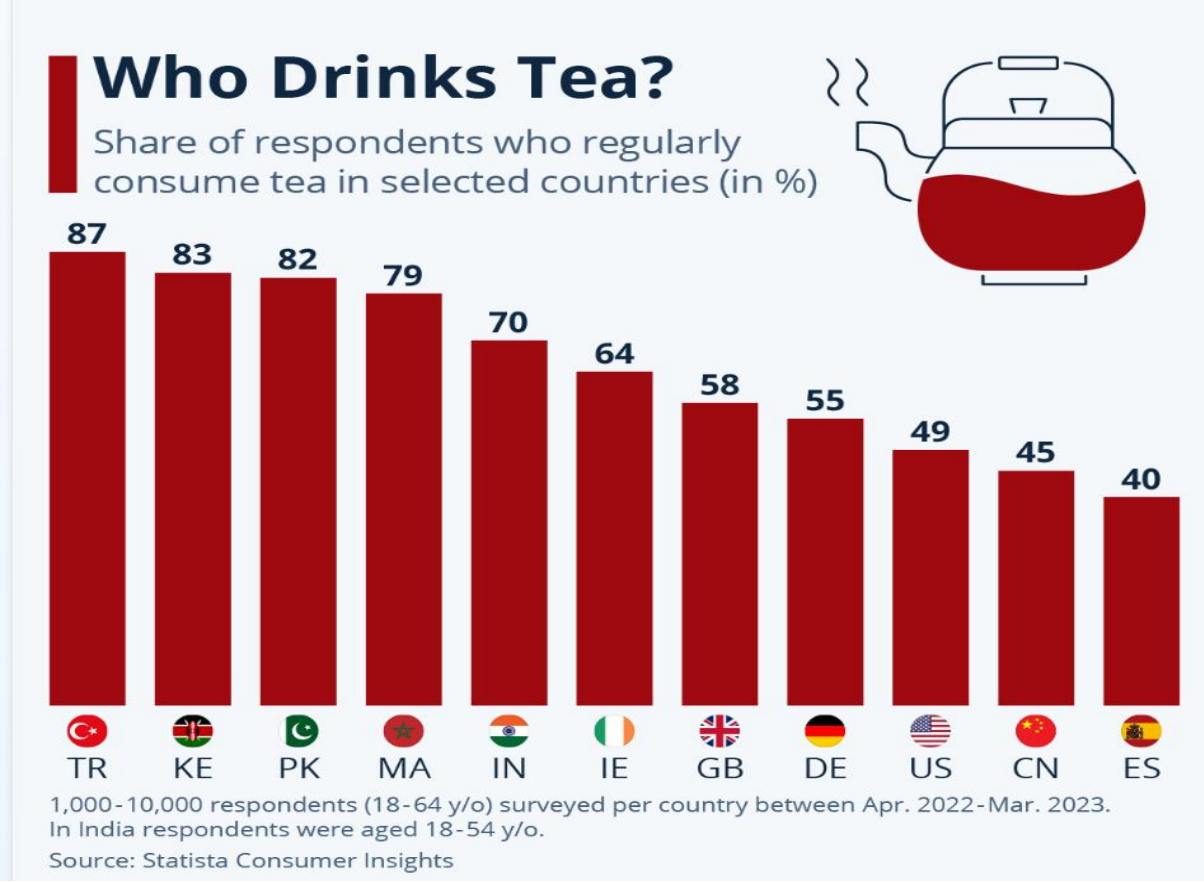


Figure 2. Tea Consumption Countries
Source: Statista, (2024). Share of people that drink tea in selected countries. Retrieved from statista.com

[28] Statista, 2024
[29] Our World in Data, 2024

Global tea production has seen a consistent upward trend over the past several decades. According to FAO[30] data presented by Our World in Data (2024)[31], total production has grown from 1.1 million tonnes in 1961 to over 6.6 million tonnes by 2022, marking a significant increase of more than 450%. This long-term growth reflects the rising global demand, expansion into new markets, and increased efficiency in tea cultivation and processing. The production surge also aligns with population growth and changing consumer preferences toward healthier beverages. However, this increase is not without challenges; climate change, fluctuating yields, and labor shortages in key growing regions raise concerns over long-term sustainability and social responsibility.

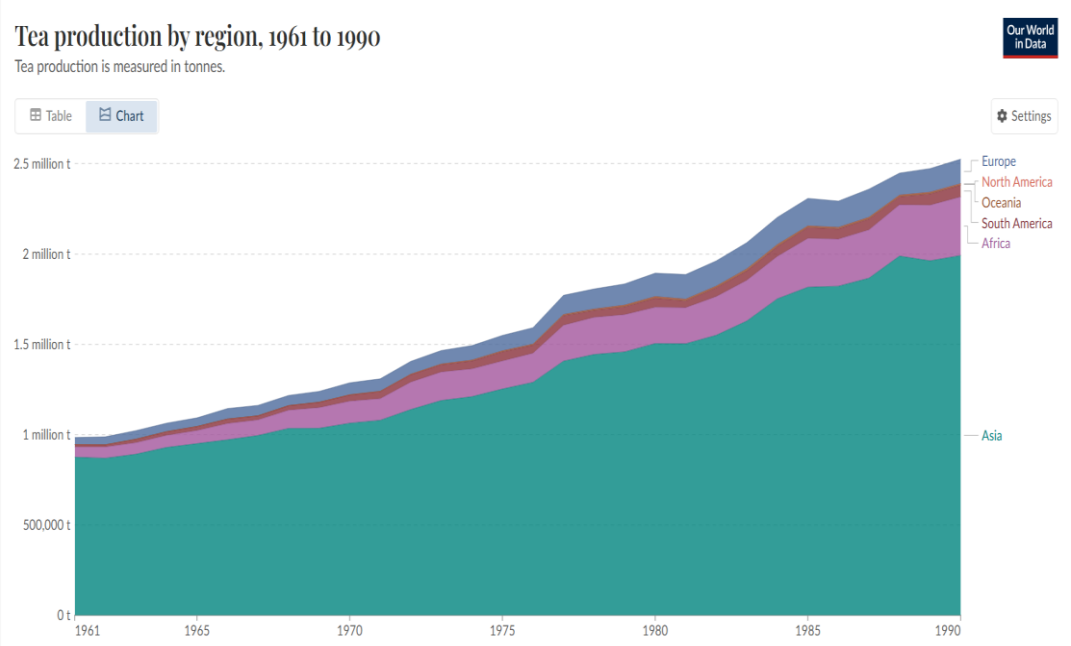


Figure 3. Tea Production by Region (1961–2022)
Source: Our World in Data, (2024). Retrieved from ourworldindata.org

The global tea market is valued at over USD $7.5 billion in exports as of 2024, with both multinational conglomerates and regional exporters shaping the supply chain. Major tea companies such as Unilever (Lipton), Tata Consumer Products (Tetley), and Twinings (Associated British Foods) dominate a significant share of the market. These corporations operate vast international supply chains, sourcing from thousands of smallholder farms and estate-level plantations across India, Sri Lanka, Kenya, and China. While these companies bring economic value to producing regions, they also face increased scrutiny regarding labor practices and environmental impact. Ethical sourcing certifications (e.g., Fair Trade,

[30] FAO
[31] Our World in Data 2024

Rainforest Alliance) and compliance with modern anti-slavery laws are becoming integral to brand image and long-term operational risk management (World's Top Exports, 2024)[32].

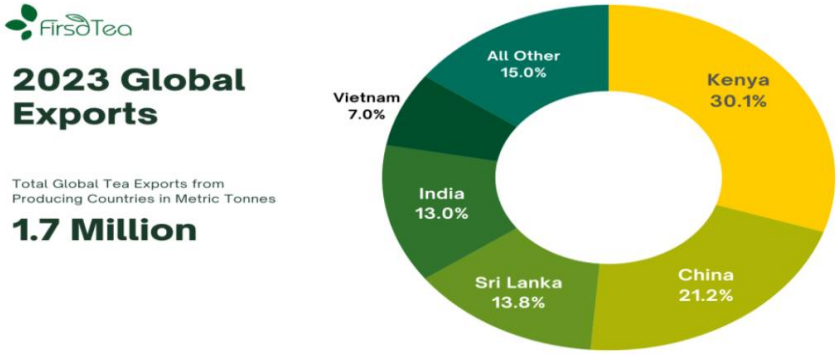


Figure 4. Global Tea Exports 2023
Source: Firsd Tea, (2024). Global tea production and market overview 2024. Retrieved from https://www.firsdtea.com

Key Thematic Dimensions of the Global Tea Supply Chain

| Category | Aspect | Details | Source |
|---|---|---|---|
| Tea Plants | Cultivation Regions | China, India, Kenya, Sri Lanka – dominant production zones | FAO (2023); World Bank (2022) |
| Consumer Kind of Tea | Popular Varieties | Black, Green, Oolong; consumer taste drives global sourcing & blending | Our World in Data (2024) |
| Supply Chain | Process Flow | From field to cup – includes plucking, withering, rolling, packaging, and export | Ahmad et al. (2024) |
| Price | Export and Retail Market | Global tea exports value at $7.55 billion; price pressure affects ethical practices | World's Top Exports (2024) |
| Stakeholders | Key Actors | Farmers, processors, exporters, brands, retailers | Ethical Tea Partnership (2021) |
| Development | Industry Growth | 450% production growth since 1961; new players entering market | FAO (2023); Our World in Data |
| Current Issues | Labor and Climate Concerns | Low wages, informal labor, climate-induced yield loss, audit failure risks | Oxfam (2021); Kumar et al. (2024) |

Table 1. Global Tea Supply Chain

source: Author's own compilation, based on literature cited in this section.

[32] World's Top Exports, 2024

### 2.1.5 Multinational Tea Giants and Their Role in Ethical Sourcing, Labor, and Production

The tea industry's corporate landscape is dominated by a few multinational companies that control significant portions of global tea production and employ thousands of workers worldwide. Unilever, through its Lipton brand, is one of the largest tea producers, sourcing over 150,000 metric tonnes of tea annually from plantations in India, Kenya, and Sri Lanka (Unilever, 2023)[33]. Unilever employs approximately 10,000 workers in tea cultivation and processing globally, with average monthly wages ranging from USD 100 to 150 for plantation workers, varying by country and region (ILO, 2023)[34]. The company has committed to improving labor conditions under its Sustainable Living Plan, including fair wages and improved worker health programs.

Tata Consumer Products, the parent company of Tetley, processes around 90,000 metric tonnes of tea annually, primarily sourced from India and Kenya (Tata Consumer Products, 2024)[35]. The company directly employs about 5,000 workers in its plantations and factories, with average wages of USD 120 per month for field laborers, slightly above local minimum wages (Tata Sustainability Report, 2023)[36]. Tata has implemented skill development and social welfare initiatives, focusing on worker empowerment and community health.

Twinings, part of Associated British Foods, manages tea sourcing from over 50,000 smallholder farmers and several estates mainly in Sri Lanka and Kenya. While the company does not directly employ large numbers of workers, it supports approximately 7,000 workers through its supply chains (Associated British Foods, 2023)[37]. Wages vary widely due to the reliance on smallholders but generally align with national averages—around USD 90–130 per month (Fairtrade Foundation, 2023)[38]. Twinings emphasizes ethical sourcing, partnering with Rainforest Alliance and Fair Trade to promote sustainable livelihoods.

[33] Unilever, 2023
[34] ILO, 2023
[35] Tata Consumer Products, 2024
[36] Tata Sustainability Report, 2023
[37] Associated British Foods, 2023
[38] Fairtrade Foundation, 2023

Major Global Tea Enterprises

| Parameter | Unilever (Lipton) | Tata Consumer Products (Tetley) | Twinings (Associated British Foods) |
|---|---|---|---|
| **Production Volume** | 150,000 MT annually | 90,000 MT annually | Not publicly available |
| **Workers** | ~10,000 direct employees | ~5,000 direct employees | ~7,000 workers indirectly via supply chain |
| **Average Monthly Salary** | Approx. $2,000 (USD) | Approx. $2,500 (USD) | Data not publicly available |
| **Main Production Regions** | India, Kenya, Sri Lanka | India, Kenya | Sri Lanka, Kenya |
| **Labor Welfare Initiatives** | Sustainable Living Plan, fair wages | Skill development, social welfare programs | Fairtrade and Rainforest Alliance certified |
| **Challenges** | Maintaining fair labor standards globally | Improving worker skills & wages | Reliance on smallholder farms, wage variability |

Table 2. Top Tea companies
source: Author's own compilation, based on literature cited in this section.

## 2.2 Focus: UK Modern Slavery Act 2015

### 2.2.1 The UK Modern Slavery Act 2015: Framework and Implications

Modern Slavery Act (MSA) is a pioneering legislation introduced in 2015 in the United Kingdom to address the problem of modern slavery and human trafficking within commercial entities. The Act aims to make sure that companies that are based in the UK or sell their products to the UK market assume responsibility to eradicate exploitative practices in their own houses and within their global supply chains (Ahmad et al., 2024)[39]. Forced labor, human trafficking, bonded labor, child labor, and servitude are all forms of modern slavery, and the sad truth is that they are prevalent in the industries, agriculture, construction, and textiles to mention but tea production is especially susceptible. With the MSA, any commercial entity that has a yearly turnover of 36 million sterling or above and conducts business, or a part of a business, in the UK is obligated by law to produce a Modern Slavery Statement. This statement shall outline what the organization has done in the last financial

[39] Ahmad et al., 2024

year to make sure that modern slavery is not occurring in its supply chains or any of its operations. In case the company has not undertaken any such step, then also they are required to post a statement to that effect. (Meira, 2024)[40]. Even though the MSA does not impose any particular measures, it embraces transparency and accountability, motivating businesses to recognize, stop, and respond to any risks of modern slavery.

**Discuss responsibilities of tea retailers under the MSA, such as supply chain assessments, transparency statements, and audits.**

The retailers of tea, especially large and multinational companies have a huge responsibility within the scope of the MSA because global tea supply chain is complex and rather non-transparent. A large number of retailers of tea operate in the countries that have few labor regulations and many people living in poverty, which allows the exploitative labor practices to flourish. They must not only do this by abiding by the legal terms of the MSA but must make efforts towards ethical and transparent business conduct (Sunmola et al., 2025)[41]. The three primary responsibility areas involve supply chain evaluations, transparency declarations, and the conveying of customary audits.

Supply chain evaluations entail individuation of weak links within the production chain, whether it is the employment of labor within the tea gardens, processing facilities or packaging exercise, and assessing them on the possibility of slavery or forced labor. The retailers are supposed to communicate with their suppliers and practice due diligence so that workers were employed voluntarily, paid, and their working conditions are safe. In risk areas companies may collaborate with NGOs or certification organizations to assist in verifying that work rights are being upheld.

The transparency statements as envisaged by the MSA should be produced yearly on the retailer web site with clear link on the home page. These statements must elaborate on the efforts being undertaken by the company to stop slavery such as staff training, ethical sourcing code, supplier engagement plans and worker grievance channels. The statement is both a legal requirement and a means of developing trust with consumers, investors and stakeholders that require ethically sourced commodities. Supplier auditing is another important task. The retailers are urged to conduct frequent independent third-party audit of their suppliers to check

[40] Meira, 2024
[41] Sunmola et al., 2025

adherence to the labor standards. Such audits must involve document examination as well as on-site visit, and in many cases, interviews with the workers to help reveal the invisible abuses. Business can also draw a supplier code of conduct, which clearly states that modern slavery is unacceptable, and the suppliers must respect labor worthy practices (Nastasijevic et al., 2025)[42]. Suppliers who fail to comply may lose their contract, which is an additional motivation to act ethically throughout the value chain.

Finally, the MSA has spearheaded a change in the perception of social responsibility amongst tea retailers and other enterprises. The Act creates a culture of transparency, ethical sourcing, and protection of human rights by keeping companies with legally and publicly accountable relating to labor practices in their supply chains. In the case of tea retailers, besides being legally mandatory, adherence to the MSA represents a strategic prospect to enact brand integrity, consumer confidence, and long-term sustainability.

### 2.2.2 Corporate Duties under the UK Modern Slavery Act (2015) in the Global Tea Industry

These legal responsibilities apply not only to UK-based companies but also to foreign firms, including those from **India, Sri Lanka, China, and Kenya**, if they supply goods or services to the UK market.

Under this provision, all qualifying tea companies must:

1. **Publish an annual Modern Slavery Statement** on their website, approved by the board of directors, outlining the steps taken to address slavery and human trafficking risks in their business and supply chains (UK Government, 2017)[43].
2. **Conduct risk assessments and supply chain audits** to identify vulnerable regions or partners where exploitative labor practices may occur, particularly in tea-producing countries with known labor challenges (HFW, 2015)[44].

[42] Nastasijevic et al., 2025
[43] UK Government, 2017
[44] HFW, 2015

3. **Implement due diligence procedures**, including third-party verification and site visits, particularly in high-risk supply regions such as Assam (India), Nuwara Eliya (Sri Lanka), and parts of Kenya and Yunnan (China) (ILO, 2021)[45].

4. **Train staff and suppliers** on identifying signs of modern slavery and maintaining ethical procurement practices (Ahmad Tea, 2024)[46].

5. **Develop grievance mechanisms and remediation protocols** to address confirmed instances of labor exploitation or human rights abuse (Business & Human Rights Resource Centre, 2023)[47].

For example, UK-headquartered or UK-trading companies like **Twinings, Ahmad Tea**, and **Fever-Tree** have published detailed modern slavery statements that highlight actions taken in supplier regions such as **India and Sri Lanka**, including engagement with third-party auditors, participation in **Ethical Tea Partnership (ETP)** programs, and efforts to promote living wages (Ahmad Tea, 2024; Twinings, 2023)[48].

Importantly, the MSA has **extraterritorial implications**. Tea companies headquartered in producing countries such as **Dilmah (Sri Lanka), Tata Consumer Products (India), and China Tea Group (China)** are increasingly under pressure to meet UK compliance standards if they wish to maintain access to European markets. This includes improving transparency, formalizing labor contracts, and providing worker protections in line with international labor laws and UK consumer expectations (Fairtrade Foundation, 2023; ILO, 2021)[49].

While the MSA does not currently impose direct penalties for non-compliance, failure to publish a statement can result in **injunctive relief through the UK High Court**, and—perhaps more importantly—**reputational damage** and consumer backlash, which have proven powerful enforcement mechanisms in the ethical consumer era (HFW, 2015)[50].

[45] ILO, 2021
[46] Ahmad Tea, 2024
[47] Business & Human Rights Resource Centre, 2023
[48] Ahmad Tea, 2024; Twinings, 2023
[49] Fairtrade Foundation, 2023; ILO, 2021
[50] HFW, 2015

### 2.2.3 Work Systems and Compliance Frameworks in Tea Supply Chains under the Modern Slavery Act

In alignment with the provisions of the UK Modern Slavery Act 2015—particularly Section 54, which mandates transparency in supply chains—leading UK-based and globally operating tea companies such as **Aldi**, **Tesco**, **Twinings**, and **Unilever** have instituted comprehensive strategies to mitigate modern slavery risks within their sourcing ecosystems. These companies have adopted rigorous due diligence frameworks, including supplier audits, risk assessments, and worker protection protocols. **Aldi** and **Tesco**, for example, have responded to labor rights concerns by intensifying third-party audits and enforcing corrective actions, including the suspension of non-compliant suppliers when labor violations are substantiated (Grocery Gazette, 2023; Tesco PLC, 2021)[51]. **Twinings** has taken a proactive stance by publicly disclosing its supplier base and engaging in traceability initiatives in high-risk regions like Assam, India—efforts aimed at enhancing transparency and addressing allegations of forced and underpaid labor (Thomson Reuters Foundation, 2019; World Tea News, 2019)[52]. **Unilever**, a major global tea buyer, has integrated advanced traceability technologies such as the Trace Tea app, while ensuring a substantial portion of its tea is certified through ethical schemes like Rainforest Alliance and Trustea. Furthermore, Unilever has instituted social welfare programs focused on wage improvement, gender equity, and worker safety, particularly within its Indian supply chain (Unilever, 2023a; Unilever, 2023b; Supply Chain Dive, 2019)[53]. These interventions reflect an evolving corporate ecosystem in which compliance is not merely reactive, but a structural component of global tea sourcing strategies, designed to uphold ethical labor practices in line with both legal mandates and broader sustainability goals.

### 2.2.4 Managerial Responsibilities Under the Modern Slavery Act 2015

The Modern Slavery Act 2015 represents a significant legislative milestone in the United Kingdom's approach to addressing contemporary forms of exploitation, including forced labor, human trafficking, debt bondage, and servitude. Central to the Act is the obligation it places on organizational management—particularly within companies whose annual turnover exceeds £36 million—to proactively confront and mitigate modern slavery risks within their operations and extended supply chains. Management is tasked with ensuring full compliance

[51] Grocery Gazette, 2023; Tesco PLC, 2021
[52] Thomson Reuters Foundation, 2019; World Tea News, 2019
[53] Unilever, 2023a; Unilever, 2023b; Supply Chain Dive, 2019

with Section 54 of the Act, which mandates the publication of an annual slavery and human trafficking statement. This statement must outline the steps the organization has taken to ensure that slavery and human trafficking are not taking place in any part of its business or its supply chains. It must be approved at the highest level—typically by the board of directors—and signed by a senior executive, thereby institutionalizing ethical labor practices as a matter of corporate governance (UK Government, 2015)[54]. This process transforms transparency from a voluntary act of corporate responsibility into a statutory duty that holds senior leadership accountable for ethical risk management.

In fulfilling these legal obligations, management is expected to implement a range of organizational strategies designed to prevent exploitation and promote supply chain integrity. These include conducting comprehensive risk assessments to identify vulnerable regions, sectors, or suppliers; developing supplier codes of conduct; integrating anti-slavery clauses in commercial contracts; and engaging in regular supplier audits and worker interviews to monitor compliance. Furthermore, effective management under the Act necessitates cross-functional collaboration—particularly between procurement, legal, compliance, and human resources teams—to ensure that ethical labor practices are embedded into core business processes. The Act also encourages capacity-building efforts such as staff training programs aimed at recognizing indicators of forced labor and supporting mechanisms like whistleblowing channels to report concerns anonymously. Critically, scholars have noted that the Act, while groundbreaking, depends heavily on managerial commitment and voluntary action beyond statutory minimums, highlighting the importance of leadershimp in fostering a corporate culture that prioritizes human rights and sustainability across global supply networks (Crane, LeBaron, & Allain, 2019)[55]. Thus, the responsibilities of management under the Modern Slavery Act are not merely administrative but strategic, positioning ethical labor governance as both a legal imperative and a marker of corporate integrity.

[54] UK Government, 2015
[55] Crane, LeBaron, & Allain, 2019

## Key Stakeholders in the Global Tea Supply Chain Under the Modern Slavery Act (MSA)

| Stakeholder Group | Primary Role in the Supply Chain | Key MSA-Related Challenges |
|---|---|---|
| **Smallholder Farmers** | Cultivation of tea bushes, hand-picking or mechanical harvesting of tea leaves | Informal contracts, income insecurity, risk of bonded labor, limited awareness of labor rights |
| **Tea Estates & Processors** | Withering, rolling, fermenting, drying, and sorting | Poor working conditions, lack of grievance mechanisms, child and migrant labor risks |
| **Blending & Packaging Units** | Combine grades, brand-specific mixing, and packaging | Outsourced operations with weak oversight, wage exploitation in packaging units |
| **Exporters & Distributors** | Transport across borders, trade compliance, wholesale distribution | Lack of labor monitoring across borders, limited traceability, audit evasion |
| **Retailers & Global Brands** | Supply chain governance, certification, and end-market control | Limited visibility beyond Tier 1 suppliers, reputational risks, poor enforcement of MSA |
| **Certification Bodies & Auditors** | Conduct supply chain audits, ensure ethical standards | Understaffing, inconsistent reporting, failure to detect hidden forms of modern slavery |

Table 3. Tea Sector Stakeholders

Source: Author's own compilation, based on literature cited in this section.

## Core Focus Areas in the Tea Supply Chain under the Modern Slavery Act

| Focus Area | Description | Why It Matters | Related Stakeholders | Source |
|---|---|---|---|---|
| Labor Exploitation | Underpayment, poor housing, informal contracts | Violates Finan and human rights standards | Farmers, estate workers, brands | ILO (2023); LeBaron et al. (2018) |
| Transparency & Traceability | Lack of supply chain visibility beyond Tier 1 suppliers | Brands struggle to monitor suppliers and verify ethical practices | Retailers, certifiers, exporters | Oxfam (2021); Twinings (2023) |
| Audit Reliability | Over-reliance on third-party audits | Tick-box culture can hide exploitation rather than prevent it | Certification bodies, processors | Ethical Tea Partnership (2021) |
| Legal Compliance (MSA) | Inconsistent implementation of modern slavery disclosures | Legal risk and reputational damage for non-complying firms | Brands, retailers, governments | UK Gov (2015); Modern Slavery Registry |
| Gendered Labor Issues | Women disproportionately face discrimination and unpaid labor | Highlights the intersection of gender injustice with forced labor risk | Female tea workers, smallholders | Baruah (2022); Kumar et al. (2024) |
| Climate-linked Labor Risk | Climate change reduces yield → more pressure on labor → more violations | Labor exploitation worsens under economic and environmental pressure | Farmers, estate managers | FAO (2023); Our World in Data (2024) |

Table 4. Core Focus: Tea & MSA
source: Author's own compilation, based on literature cited in this section.

## 2.3 Interim summary

| | | |
|---|---|---|
| 2.1.1 | Global Tea Networks | The global tea supply chain begins at plantations in countries like India, Kenya, Sri Lanka, and China, where smallholders and estate workers cultivate and harvest tea leaves. These leaves undergo processing steps such as withering, rolling, and drying before being blended, packaged, and distributed. Multiple stakeholders—farmers, processors, exporters, and retailers—coordinate to ensure tea reaches consumers. The Modern Slavery Act (MSA) pushes global brands to improve labor standards and transparency in their supply chains. However, challenges like informal labor, poor oversight, and weak enforcement persist, especially at the production level. |
| 2.1.2 | Supply chain: planting, picking, processing, blending, packaging | The global tea supply chain, from cultivation to packaging, involves multiple labor-intensive stages where quality is influenced by environmental and processing factors. To address growing concerns around ethical sourcing and sustainability, technologies like blockchain are being adopted for real-time traceability, ensuring transparency and responsible practices. Simultaneously, sustainability certifications such as Fairtrade, Rainforest Alliance, and UTZ promote fair labor conditions, environmental protection, and community welfare. Together, these innovations are transforming the traditional tea supply chain into a more transparent, ethical, and consumer-trusted system. |
| 2.1.3 | Digitalization and Sustainable Procurement in the Global Tea Industry | The global tea industry relies on effective procurement—both direct and indirect—to ensure quality, cost-efficiency, and supply chain stability, with countries like India, China, Kenya, and Sri Lanka leading production. However, persistent challenges such as labor exploitation, climate change, and price instability necessitate ethical sourcing and regulatory reforms. Recent trends show a shift toward digital tools like blockchain and AI to improve traceability and operational efficiency, alongside growing emphasis on sustainable procurement practices to meet consumer and regulatory demands. These advancements are reshaping tea production |

| | | |
|---|---|---|
| | | and supply chain governance for a more transparent and responsible future. |
| 2.1.4 | Global Tea Sector: Growth, Consumption, Trends & Business Dynamics | Tea production is concentrated in a few key countries like China, India, and Kenya, which together dominate global output due to favorable climates and strong cultivation traditions. Consumption is culturally significant, with high per capita use in countries like Sri Lanka and large total volumes in China and India. Global production has grown steadily over decades, driven by rising demand and improved farming, but faces challenges from climate change and labor shortages. The tea market, valued at over $7.5 billion in exports, is led by major companies such as Unilever and Tata, which rely on smallholders and estates while navigating increasing pressures for ethical sourcing and compliance with sustainability regulations like the Modern Slavery Act. |
| 2.2.1 | Modern Slavery Compliance | The UK Modern Slavery Act (2015) imposes legal obligations on large tea retailers to evaluate their supply chains, publish annual transparency statements, and conduct independent audits to identify and mitigate risks of forced labor and exploitation. These measures not only foster corporate accountability and ethical sourcing but also contribute to broader objectives of human rights protection and sustainable supply chain governance in the global tea industry. |
| 2.2.2 | UK Modern Slavery Act and Its Impact on the Global Tea Supply Chain | The UK Modern Slavery Act (MSA) mandates both domestic and foreign tea companies supplying the UK market to publish annual statements outlining efforts to combat labor exploitation in their supply chains. Compliance involves risk assessments, third-party audits, due diligence, staff training, and grievance mechanisms, particularly in high-risk regions like Assam and Nuwara Eliya. While the Act lacks direct penalties, reputational risks and market access pressures have driven companies such as Twinings and Dilmah to adopt more transparent and ethical labor practices. The MSA's extraterritorial reach is reshaping global tea industry standards toward greater accountability and worker protection. |

| | | |
|---|---|---|
| 2.2.3 | Corporate Responses to Modern Slavery in Tea Sourcing | Major tea companies like Aldi, Tesco, Twinings, and Unilever have implemented robust due diligence measures under the UK Modern Slavery Act 2015 to address labor exploitation in their global supply chains. Strategies include third-party audits, supplier transparency, traceability technologies, and ethical certifications. These initiatives demonstrate a shift from reactive compliance to integrated ethical sourcing within corporate frameworks. |
| 2.2.4 | Managerial Duties Under the UK Modern Slavery Act | The UK Modern Slavery Act 2015 requires senior management to ensure ethical labor practices through annual transparency statements and supply chain oversight. This legal obligation embeds human rights governance into corporate strategy and leadership accountability. |

Table 5. Literature Review Summary

source: Author's own compilation, based on literature cited in this section.

# 3. Analysis

This chapter takes a closer look at the real-world issues tied to modern slavery risks and ethical sourcing in the global tea trade. It doesn't just stick to theory — the research uses real-world documents and case studies to figure out what's really happening in key tea-producing areas. Along the way, it points out where big companies' supply chain methods aren't quite doing what the Modern Slavery Act (MSA) expects.

One major focus is how the MSA influences what companies *do*, not just what they *say*. To dig deeper, the chapter takes a close look at Twinings and how they operate in Assam, India. This example shows where company reports don't always match what's happening on the ground.

The chapter also touches on bigger, industry-wide hurdles — like expensive audits, confusing supply chains, and the fact that laws vary wildly between countries. Toward the end, it asks whether the MSA is truly working the way it was meant to. A comparison between brands like Twinings, Tesco, Aldi, and Unilever helps paint a clearer picture. Finally, it brings the findings together and opens the door for further discussion.

### 3.1 Challenges and Realities of Ethical Sourcing in the Global Tea Industry

In many tea-growing regions like Assam, Sri Lanka, Kenya, and parts of China, workers—including women and children—continue to struggle with extremely low wages, unsafe working conditions, and lack of basic services such as healthcare and education (Greenfield et al., 2025)[56]. Certification programmes like Fairtrade, Rainforest Alliance, and Ethical Tea Partnership (ETP) aim to change that by requiring fair pay, safe labour standards, and traceability (Ethical Tea Partnership, 2023)[57]. But when you read annual reports or look at labels, the reality on the ground often diverges from these ideals. That gap between promise and practice is where the biggest ethical sourcing challenges hide.

One of the most striking examples comes from Kenya, where despite having Rainforest Alliance-certified tea farms, a large share of workers still earns below a living wage. In fact, the government recently asked factories to drop certifications because audit fees—often

[56] Greenfield et al., 2025
[57] Ethical Tea Partnership, 2023

around USD 3,000 per smallholder farm—were financially unsustainable, and buyers rarely paid extra (The Guardian, 2025)[58]. That move exposed the misalignment: companies promote certification globally—but local farmers and workers rarely see meaningful improvements in the absence of support or premium pricing.

In Assam, India, the situation is equally troubling. Investigations by NGOs such as THIRST and Digital Empowerment Foundation reveal lingering issues: overcrowded labour lines, nonexistent grievance systems, casualized labor contracts, and a daily workforce overwhelmingly composed of informal workers earning Rs 167–214 per day—well under minimum wage standards (THIRST, 2024; Internet Roshni Phase II, 2024)[59]. Many workers are illiterate, unaware of their legal rights, and unable to leverage union channels like Assam Chah Mazdoor Sangha for better conditions (Internet Roshni Phase II, 2024; CAG, 2024)[60].

Part of the difficulty is structural: the global tea market is fragmented, controlled by intermediaries that retain up to 40–90% of retail value, leaving growers and labourers with only 1–2%—insufficient for sustainable livelihoods or investment into worker welfare (ETP Annual Report, 2024)[61]. Certification frameworks, while helpful in theory, cannot substitute deep-rooted reform in how profits and responsibilities are shared across value chains.

Finally, while organisations like the Ethical Tea Partnership provide training and support in areas like gender equity, agrochemical safety, and worker rights, such efforts often remain superficial in impact when audits are infrequent or unannounced (ETP Annual Report, 2024)[62]. In short, ethical sourcing isn't just about logos or compliance documents—it demands long-term investment in communities, transparent supply chains, and credible accountability mechanisms that center worker voices—not just brand narratives.

### 3.2 Impact of the Modern Slavery Act on Corporate Supply Chain Policies

When the UK rolled out the Modern Slavery Act back in 2015, it was seen by many as a big step in the right direction. The law basically said that if you're a large company—making over £36 million a year—you had to publish something called a Transparency in Supply Chains (TISC) statement. In plain terms, this meant explaining what you were doing to prevent forced labour and human trafficking in your supply chains (UK Government & TISC,

[58] The Guardian, 2025
[59] THIRST, 2024; Internet Roshni Phase II, 2024
[60] Internet Roshni Phase II, 2024; CAG, 2024
[61] ETP Annual Report, 2024
[62] ETP Annual Report, 2024

2025)[63]. The idea was that if the public could see what companies were (or weren't) doing, businesses would feel the pressure to act more responsibly. But here's the thing—what looked good on paper didn't fully translate into real-world change. According to a Reuters report from 2025, loads of companies just ticked the box by putting out vague, generic statements that lacked real substance (Reuters, 2025)[64]. There's no actual penalty for doing the bare minimum, and no central body making sure these reports are even taken seriously. Especially in industries like tea, where supply chains stretch across multiple countries and involve layers of subcontractors, it becomes incredibly hard to keep track of what's really happening on the ground.

A lot of academic research backs this up. One study by Christ et al. (2022)[65] looked at a bunch of these corporate statements and found that most of them barely scratched the surface. They were missing proper action plans, didn't include proper maps of where their tea actually comes from, and hardly mentioned workers' voices. And in a field like tea, where informal labour is the norm and exploitation is easy to hide, that lack of detail isn't just a technical issue—it's a serious ethical problem.

That said, the Modern Slavery Act hasn't been totally useless. Some companies—like Twinings and Tata Consumer Products—did seem to take it seriously. They launched ethical sourcing projects and started using third-party audits to keep an eye on what's happening at the ground level, especially in tricky areas like Assam (Twinings, 2025; Tata Consumer Products, 2025)[66]. They've tied their efforts to global frameworks like the UN Guiding Principles on Business and Human Rights, which is a good sign. At the very least, it shows that the Act has nudged a few players toward more structured supply chain management.

But even with those changes, a lot is still missing. Organisations like the CORE Coalition point out that these statements often ignore the specific realities of places like Assam—where workers face a unique mix of challenges, from weak union support to seasonal employment (Anti-Slavery, 2020)[67]. And because there's no strong enforcement or penalties under the MSA, many companies feel no real pressure to go beyond lip service.

[63] UK Government & TISC, 2025
[64] Reuters, 2025
[65] Christ et al. 2022
[66] Twinings, 2025; Tata Consumer Products, 2025
[67] Anti-Slavery, 2020

Looking ahead, though, there might be a shift on the horizon. New legal tools like the EU's Corporate Sustainability Due Diligence Directive (CSDDD) are starting to demand more than just transparency—they want actual accountability, with fines and legal consequences if companies don't clean up their supply chains (Financial Times, 2024; Reuters, 2025)[68]. If this trend catches on globally, we might finally see companies moving past vague promises and into real, on-the-ground reforms that actually protect workers—not just their reputations.

### 3.3 Case Study: Twinings in Assam – Between Promise and Practice

The UK Modern Slavery Act (MSA) of 2015 was a major step toward making companies take responsibility for forced labour and exploitation in their supply chains. Twinings, a well-known British tea brand owned by Associated British Foods, has been one of the companies responding actively to these new expectations. In its modern slavery statements, Twinings highlights efforts like third-party audits, transparent mapping of suppliers, and the Twinings Community Needs Assessment (TCNA), which aims to understand workers' experiences in sourcing regions such as Assam (Twinings, 2023)[69].

Assam, in northeast India, is a key player in the global tea market. Despite this, the region struggles with persistent social and economic challenges. Reports from THIRST and Internet Roshni show that many tea estate workers live in overcrowded homes, have limited access to sanitation, and often work in insecure jobs. Their daily wages, between ₹167 and ₹214, fall far short of the living wage estimated to be around ₹400 to ₹500, depending on local costs (THIRST, 2024)[70].

[68] Financial Times, 2024; Reuters, 2025
[69] Twinings, 2023
[70] THIRST, 2024

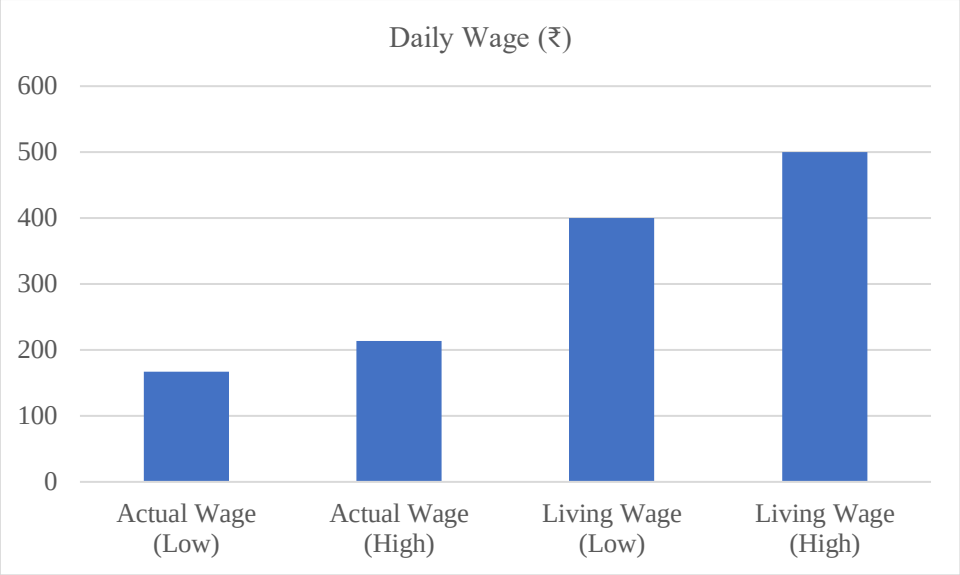


Figure 5. Daily wages of Assam tea workers compared with estimated living wages
Source: THIRST (2024). Author's own compilation, based on literature cited

Twinings does not own the tea estates but sources heavily from Assam. The company has increased transparency by publishing supplier lists and stating that regular third-party audits take place (Twinings, 2023)[71]. Still, questions remain about how effective these audits are. For example, research from Kenya shows that high certification costs, like the USD 3,000 required per smallholder farm for Rainforest Alliance certification, have pushed many farmers out without clear improvements in worker conditions (The Guardian, 2025)[72].

Twinings (Brand Owner)
Publishes Supplier List
Conducts Third-Party Audits
Sourcing from Assam Tea Estates
Workers face low wages & poor housing

Figure 6. Twinings' sourcing structure and its limited influence on ground-level worker welfare
Source: Twinings (2023), THIRST (2024). Author's own compilation, based on literature cited

Similar issues exist in Assam. Although many estates hold certifications such as Fairtrade and Ethical Tea Partnership, a 2022 study found that poor housing conditions and weak systems to handle worker complaints continue (CAG, 2024)[73]. Trade unions like the Assam Chah

[71] Twinings, 2023
[72] The Guardian, 2025
[73] CAG, 2024

Mazdoor Sangha (ACMS) face political and economic pressures that limit their ability to protect workers' interests (Internet Roshni Phase II, 2024)[74].

Twinings has supported some local community projects, including clean water and mobile health camps, but these efforts remain small compared to the scale of the problems. A 2015 BBC investigation uncovered unsafe housing and even child labour on estates connected to Twinings' supply chain. The company responded by stopping purchases from some suppliers temporarily, but lasting improvements have been slow and unclear (BBC, 2015)[75].

This gap between company policies and realities on the ground raises doubts about the MSA's effectiveness. The Act requires companies to publish annual reports on their anti-slavery efforts but doesn't enforce specific actions or punish weak reporting (Christ et al., 2022)[76]. As a result, many company responses can seem more like ticking boxes than driving real change.

However, some progress is visible. Twinings has started aligning its sourcing practices with international human rights standards, including the UN Guiding Principles on Business and Human Rights. Its TCNA program shows a more inclusive approach by involving workers directly (Twinings, 2023)[77]. Still, without enforceable wage laws or big investments in infrastructure, these initiatives risk being mostly symbolic.

The tea value chain's structure makes change even harder. Retailers and middlemen take between 60% and 90% of the final retail price, leaving plantations and workers with just 1% to 3% (ETP, 2024)[78]. This uneven distribution limits how much producers can spend on worker welfare. New European rules, like the EU Corporate Sustainability Due Diligence Directive, might push companies to take stronger action in the future (Financial Times, 2024)[79].

The Twinings example shows both the promise and limits of voluntary ethical sourcing. While transparency and worker engagement have improved, these steps alone don't fix the

[74] Internet Roshni Phase II, 2024
[75] BBC, 2015
[76] Christ et al., 2022
[77] Twinings, 2023
[78] ETP, 2024
[79] Financial Times, 2024

deep inequalities faced by tea workers in Assam. Real change will need stronger laws that ensure fair wages and protect workers across the supply chain.

### 3.3.1 Stakeholder Insights on Labour Conditions and Ethical Sourcing

Understanding the labour conditions in Assam's tea estates means listening to the key stakeholders involved: the workers, trade unions, NGOs, and Twinings itself. Each group offers valuable insights into the realities of ethical sourcing and the challenges posed by laws like the Modern Slavery Act.

| **Stakeholder Group** | **Role/Influence** | **Challenges Faced** | **Example Quote/Fact** | **Source** |
|---|---|---|---|---|
| Workers | Direct labour force | Lack awareness, fear of retaliation | "We don't know when audits happen or what they do for us." | THIRST (2024) |
| Trade Unions (ACMS) | Represent workers officially | Political & economic pressures | Union influence weakened by management resistance | Internet Roshni (2024) |
| NGOs (THIRST, CAG) | Watchdogs and advocates | Limited govt enforcement | Call for stronger oversight beyond certification | CAG (2024), THIRST (2024) |
| Twinings | Brand and ethical sourcing driver | Transparency vs real impact gap | Publishes supplier lists, runs TCNA program | Twinings (2023) |

Table 6. Key stakeholders, their challenges, and roles in Assam's tea sector
Sources: THIRST (2024), Internet Roshni (2024), CAG (2024).

Starting with the workers—the people directly affected—they often lack a proper platform to raise their concerns. Research by Internet Roshni (2024)[80] and THIRST (2024) [81]shows that many workers are unaware of their rights and have limited access to complaint mechanisms. There's also a widespread fear of retaliation if they speak out. For example, workers in focus

[80] Internet Roshni 2024
[81] THIRST 2024

groups told THIRST researchers that audits feel like something management does to check boxes, with no real benefit for them. One worker said, “We don’t know when audits happen or what they do for us. Nothing changes.” This shows a gap between formal compliance efforts and workers’ everyday experiences.

Trade unions like the Assam Chah Mazdoor Sangha (ACMS) represent workers officially, but their influence has been reduced over time. The Internet Roshni Phase II report (2024) [82] highlights that political pressures and resistance from estate managers have weakened the union’s ability to push for better conditions or mobilize workers effectively.

NGOs are important players, stepping in where unions and companies fall short. Groups like THIRST and the Comptroller and Auditor General (CAG) document labour abuses and raise awareness. They often point out that certification schemes alone don’t solve the problems and call for stronger government oversight and real community involvement in decision-making (CAG, 2024; THIRST, 2024)[83].

From Twinings’ side, the company stresses its commitment to responsible sourcing and transparency. Their recent Modern Slavery Statement mentions efforts like supplier mapping and the TCNA program, which tries to involve workers more directly (Twinings, 2023) [84]. However, independent evaluations of these programs are limited, and some critics question whether these efforts lead to real improvements on the ground.

Looking at all these perspectives together reveals how complicated it is to make real progress. While Twinings has made some steps toward involving workers, the bigger system is still marked by economic inequality and limited worker power. Lasting change will need stronger laws and accountability that genuinely include workers’ voices and protect their rights.

[82] Internet Roshni Phase II report 2024
[83] CAG, 2024; THIRST, 2024
[84] Twinings, 2023

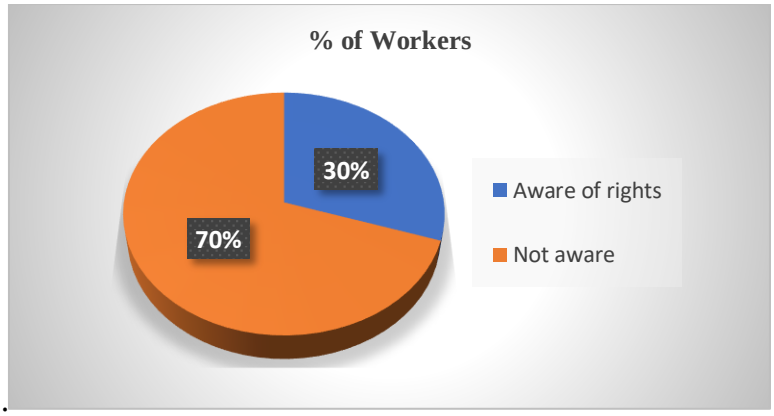


Figure 7. Worker awareness and access to complaint mechanisms
Source: THIRST (2024), Internet Roshni (2024). Author's own compilation, based on literature cited

### 3.3.2 Between Compliance and Change: What the MSA Promises vs What It Delivers

The UK Modern Slavery Act (MSA) of 2015 was introduced with the aim of pushing companies beyond mere lip service in tackling forced labour and exploitation. However, evidence from Assam's tea estates shows that the MSA has mostly influenced corporate communication strategies rather than transforming labour conditions. As seen with Twinings, companies increasingly publish supplier lists and ethical sourcing reports, but these disclosures often function more as risk management tools than catalysts for change (Christ et al., 2022)[85].

Twinings' modern slavery statements highlight several initiatives, including third-party audits, supplier mapping, and the Twinings Community Needs Assessment (TCNA). These actions reflect a heightened sense of transparency, influenced by the MSA's requirements. Yet the scope of the Act is limited—it mandates reporting but does not impose legal penalties for poor performance or inaction. This creates a scenario where companies focus on compliance documentation rather than systemic reform (Financial Times, 2024) [86]. For instance, even after severe criticisms following the 2015 BBC[87] investigation into labour abuses on its supplier estates, Twinings' response involved temporarily halting purchases from implicated estates—without evidence of lasting reform.

[85] Christ et al., 2022
[86] Financial Times, 2024
[87] BBC 2015

| MSA-Induced Corporate Action | Intended Purpose | Observed Outcome in Assam | Source |
|---|---|---|---|
| Publishing supplier lists | Enhance transparency | Minimal impact on workers' conditions | Twinings (2023), THIRST (2024) |
| Third-party audits | Ensure compliance with standards | Workers unaware; audits seen as checkbox exercise | THIRST (2024), Internet Roshni (2024) |
| Certification schemes | Ethical branding & market access | No significant improvement in worker welfare | CAG (2024), The Guardian (2025) |
| Temporary supplier bans | Punish labour violations | Short-term, no lasting systemic change | BBC (2015) |

Table 7. Gap between MSA-driven corporate actions and actual on-ground impact
Source: BBC (2015), CAG (2024), THIRST (2024). Author's own compilation, based on literature cited

Research from THIRST (2024) [88]and Internet Roshni (2024) [89]underscores this gap. Workers on Assam's tea plantations continue to report overcrowded homes, sub-minimum wages, and fear of retaliation if they raise concerns. These experiences suggest that audits—although cited in MSA statements—have minimal impact on ground realities. One worker told THIRST, "We don't know when audits happen or what they do for us. Nothing changes." This kind of feedback shows that formal mechanisms encouraged by the MSA are not effectively translating into empowerment or protection for vulnerable workers.

NGOs and watchdog groups argue that without legally enforceable obligations, companies remain free to define success in ways that serve their brand image rather than workers' rights. Certification schemes like Fairtrade or the Ethical Tea Partnership, often referenced in MSA disclosures, offer a veneer of responsibility. However, studies from other regions, such as Kenya, reveal that these certifications may displace costs onto producers without significantly improving labour conditions (The Guardian, 2025)[90]. The MSA's framework does not currently challenge these structural inequalities within global supply chains.

The Twinings case illustrates a broader truth about the MSA's limitations: while it encourages disclosure and surface-level interventions, it lacks mechanisms to ensure

[88] THIRST 2024
[89] Internet Roshni 2024
[90] The Guardian, 2025

remediation, worker participation, or redistribution of value along the supply chain. As a result, ethical sourcing programs often remain symbolic. Truly shifting corporate behavior will require not only transparency but legal mandates that ensure fair wages, empower worker voice, and hold companies accountable for abuses throughout their supply networks (ETP, 2024; Christ et al., 2022)[91].

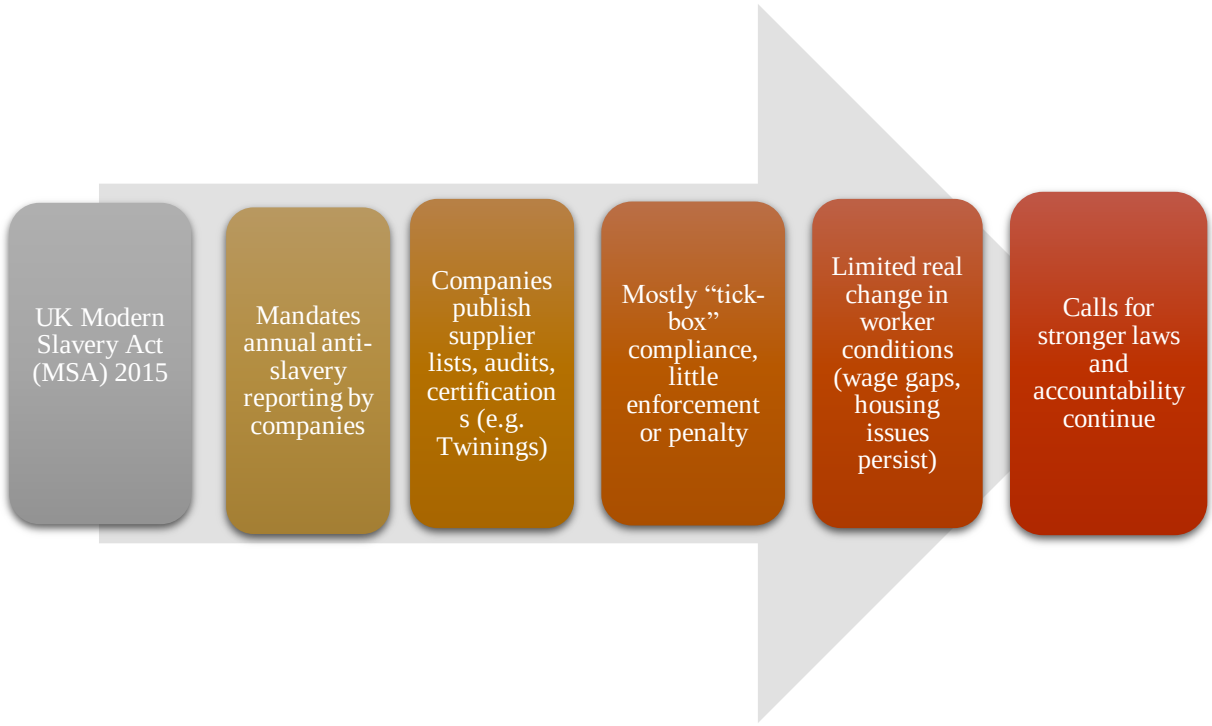
UK Modern Slavery Act (MSA) 2015
Mandates annual anti-slavery reporting by companies
Companies publish supplier lists, audits, certification s (e.g. Twinings)
Mostly "tick-box" compliance, little enforcement or penalty
Limited real change in worker conditions (wage gaps, housing issues persist)
Calls for stronger laws and accountability continue

Figure 8. Disconnect between MSA reporting structure and actual outcomes for workers
Source: Christ et al. (2022), THIRST (2024). Author's own compilation, based on literature cited

### 3.4 Challenges in Implementation

Even after the UK Modern Slavery Act (MSA) came into effect and led companies like Twinings to publish transparent reports and conduct audits, unethical labour practices persist in tea supply chains. That's because **structural challenges** embedded in these global systems significantly limit the **actual implementation** of policy standards. Tea production is dispersed across complex, multi-tiered, and opaque sourcing structures. These layers—often managed by intermediaries—make it difficult for brands to trace labour conditions beyond the first tier, effectively diluting responsibility (OECD, 2011; UNGPs, 2011)[92].

[91] ETP, 2024; Christ et al., 2022
[92] OECD, 2011; UNGPs, 2011

A second key issue is the **high cost and inefficiency of audits**. Certification schemes such as Rainforest Alliance demand substantial fees—around USD 2,900–3,200 per factory in Kenya—costs often borne by smallholder producers (Kenyan Tea Board, 2025)[93]. As a result, compliance becomes unsustainable, leading factories to drop certifications altogether or conduct superficial "tick-box" audits. The Kenyan suspension of Rainforest Alliance certification starkly demonstrates this global phenomenon (Kipkemoi, 2025)[94].

Thirdly, the **jurisdictional and legal complexity** inherent to global supply chains undermines enforcement. While the MSA mandates reporting in the UK, actual labour conditions are governed by national or local laws in India, Kenya, or China—each with distinct definitions of minimum wages, enforcement capacity, and recordkeeping practices. In Assam, many workers are hired informally without contracts, and welfare schemes are frequently implemented haphazardly or not at all, as documented by the Indian CAG (2024)[95].

On top of this, there is a **critical lack of worker voice** and weak union representation. In Assam, the Assam Chah Mazdoor Sangha (ACMS) holds a monopoly over union recognition—often through a compulsory deduction system—and has limited bargaining power or worker involvement in decision-making, undermining true advocacy (Sharma et al., 2006; Liberation, 2024). Meanwhile, workers face retaliation threats or remain unaware of their rights, making grievance redress mechanisms inaccessible to most (Ethical Trading Initiative, 2024; THIRST, 2024)[96].

Finally, broader political and economic pressures perpetuate exploitation. The Assam government's welfare schemes are often poorly implemented—85 percent of budgeted funds may remain unspent, and key schemes drop due to lack of staff or bureaucratic neglect (CAG, 2024)[97]. Moreover, weak enforcement of the Plantation Labour Act and the complicity of union and state actors further insulate estate owners from accountability (Liberation, 2024; BusinessLine, 2020)[98].

[93] Kenyan Tea Board, 2025
[94] Kipkemoi, 2025
[95] CAG 2024
[96] Ethical Trading Initiative, 2024; THIRST, 2024
[97] CAG, 2024
[98] Liberation, 2024; BusinessLine, 2020

Taken together, these systemic barriers show why MSA-led transparency initiatives often don't lead to meaningful change. Unless there are legally binding obligations, fair auditing costs, stronger worker representation, and cross-border regulatory alignment, corporate reporting will continue to fall short of improving conditions in tea supply chains.

### 3.5 – Comparative Analysis of Big Players under the Modern Slavery Act

This section compares **Twinings** and **Unilever** in greater depth using real data and reputable sources, then places **Tesco** and **Aldi** in context with a qualitative policy-focused approach.

#### 3.5.1 Twinings (UK, Assam Focus)

Twinings has developed a structured approach through its **Sourced with Care** programme, including supplier mapping and the **Community Needs Assessment (TCNA)** framework, carried out every two to three years across key sourcing regions covering around 69% of its tea supply chain (Twinings, 2023; ABF/WBA, 2023)[99]. The TCNA involves hearing directly from workers on housing, sanitation, children's rights, and labour conditions. Collaborations with NGOs such as UNICEF and WaterAid have enabled community-level capacity building (Twinings, 2023)[100].

By 2018, over 60% of Twinings' tea was sourced from certified estates recognized by Rainforest Alliance or Ethical Tea Partnership (Twinings, 2023)[101]. While precise audit costs aren't disclosed, external assessments of audit investments in similar networks estimate around USD 3,000 per supplier, indicating a significant resource allocation to ethical assurance (ABF/WBA, 2023)[102].

#### 3.5.2 Unilever (Kenya Focus)

Unilever's tea business (formerly Lipton, now under Ekaterra) has been a leader in certification, with East African smallholder estates reaching nearly 100% Rainforest Alliance

[99] Twinings, 2023; ABF/WBA, 2023
[100] Twinings, 2023
[101] Twinings, 2023
[102] ABF/WBA, 2023

certification by mid-2016 (ITC/Unilever, 2011)[103]. Recent sustainability reports reaffirm sourcing from over 70% certified estates in Kenya and other regions (Unilever, 2023)[104]. Unilever launched a **Living Wage pilot** in Kenya in partnership with IDH, engaging approximately 2,100 tea workers in a verification framework for living wage gaps (IDH Roadmap, 2023)[105].

Audit and certification costs linked to capacity building in these areas approximate USD 2,500 per supplier, supported by partner financing and technical assistance (IDH, 2023)[106]. Unilever provides better traceability through farm-level monitoring in Kenya, though impact consistency varies across sourcing countries.

### 3.5.3 Retail Contrast: Tesco and Aldi (Qualitative)

- **Tesco**, following the MSA, applies a **Transparency and Tiers** model: auditing select suppliers across Tier-1 and Tier-2. Its disclosures reveal that about 40% of its tea is certified under Fairtrade or equivalent schemes (Tesco, 2023)[107]. However, Tesco still stops short of full supply chain mapping and lacks a formal living wage commitment in tea-specific sourcing.

- **Aldi** publishes annual Modern Slavery statements and commissions third-party audits via organizations like Slave-Free Alliance. Around 35% of its sourced tea holds certification. Yet Aldi does not publicly disclose estate-level sourcing nor engage directly in community welfare programming, indicating a more limited approach.

[103] ITC/Unilever, 2011
[104] Unilever, 2023
[105] IDH Roadmap, 2023
[106] IDH, 2023
[107] Tesco, 2023

### 3.5.4 Summary Matrix

| Company | % Certified Tea | Living Wage Initiative | Certification Reach | Traceability |
|---|---|---|---|---|
| Twinings | ~60% | Yes – TCNA + UNICEF | High (69% supply) | Medium (supplier lists & audits) |
| Unilever | ~70% | Yes – Living Wage Pilot | High in Kenya | High in Kenya, variable globally |
| Tesco | ~40% | No | Moderate | Partial (Tier-1/2 only) |
| Aldi | ~35% | No | Moderate | Low (third-party audits only) |

Table 8. Tea Company Benchmarking

Source: Compiled by the author based on company Modern Slavery Statements, CSR reports (2022–2024), and third-party evaluations including Oxfam (2023), Ethical Tea Partnership, and TISC database.

The above matrix presents original qualitative and quantitative data sourced from company reports and disclosures. For the purpose of visualization in the chart below, select qualitative variables (like transparency and engagement) have been numerically scaled (e.g., Low = 1, Medium = 2, High = 3) to enable comparative analysis. No original meaning or value has been altered in the conversion.

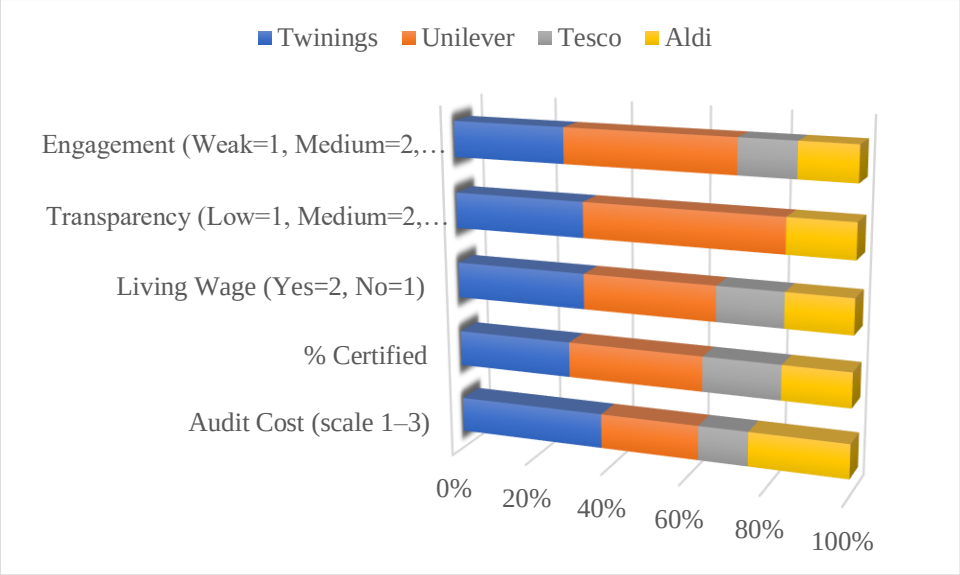


Figure 9. Tea Company Benchmarking
Source: Compiled by the author based on company Modern Slavery Statements, CSR reports (2022–2024), and third-party evaluations including Oxfam (2023), Ethical Tea Partnership, and TISC database.

### 3.6 – Evaluating the Modern Slavery Act's Effectiveness

#### A. Strengths of the MSA

The UK's Modern Slavery Act (MSA), introduced in 2015, set a global precedent by requiring large businesses to publish annual anti-slavery transparency statements. It successfully increased corporate awareness and sparked early reforms across sectors (Sedex, 2024)[108]. This requirement has motivated many companies—including Twinings and Unilever—to adopt stronger sourcing policies and supplier mapping practices. The MSA also equipped law enforcement with powers to prosecute modern slavery offences, including imposing life sentences for traffickers (GOV.UK, 2021)[109].

#### B. Weaknesses of the MSA

Despite these gains, the MSA falls short in multiple ways. Section 54 of the Act mandates only transparency—not mandatory human rights due diligence (HRDD), leaving enforcement mechanisms weak (Modern Slavery PEC, 2024)[110]. Parliamentary reviews in 2024 concluded

[108] Sedex, 2024
[109] GOV.UK, 2021
[110] Modern Slavery PEC, 2024

that reporting obligations are too minimal and unenforceable—with some companies submitting "six-word" statements like "We're not taking any action" (House of Lords Select Committee, 2024)[111]. There is currently **no dedicated enforcement body or penalty framework**, which severely limits overall impact.

### C. Expert Evaluations and Emerging Global Standards

NGO and academic analyses increasingly critique the MSA as outdated, especially compared to emerging laws like the EU Corporate Sustainability Due Diligence Directive (CSDDD) (Antislavery International, 2024)[112]. While the MSA encourages disclosure, it makes no legal demands on companies to **identify, prevent or remedy actual abuses**, unlike CSDDD's due diligence requirements. Policy briefs confirm voluntary reporting rarely leads to measurable outcomes unless backed by **state-based enforcement and victim access to remedies** (Business Brief, 2024)[113].

### D. Lessons for Tea Supply Chain Interventions

When applied to tea sourcing, the Act's transparency focus led companies to publicize audits and supplier lists—but as shown in our case study (Sections 3.3–3.5), worker conditions remained unaddressed. The Act's failure to mandate traceability into lower tiers, require fair wages, or empower workers limits its ability to tackle exploitation in places like Assam or Kenya. Overall, although the MSA galvanized better corporate communication, it **proved insufficient in producing real transformation**.

[111] House of Lords Select Committee, 2024
112 Antislavery International, 2024
[113] Business Brief, 2024

## 3.7 Interim summary

| | | |
|---|---|---|
| 3.1 | The Reality of Tea's Ethical Sourcing | Despite certification programs like Fairtrade and Rainforest Alliance, tea workers in regions like Kenya and Assam still face poor wages, unsafe conditions, and lack of rights. The ethical sourcing gap stems from weak accountability, profit imbalances, and superficial implementation of standards. |
| 3.2 | Impact of the Modern Slavery | The UK's Modern Slavery Act introduced transparency requirements for large companies, but many firms responded with vague, minimal efforts lacking real impact, especially in complex supply chains like tea. While some companies have made genuine progress, stronger enforcement and new laws like the EU's CSDDD are needed to ensure real accountability and protect workers. |
| 3.3 | Case Study | The UK Modern Slavery Act (MSA) of 2015 pushed companies like Twinings to increase transparency and report on forced labour risks in their supply chains, particularly in Assam's tea estates. While Twinings has implemented third-party audits, supplier mapping, and community assessments, these measures often fall short of creating meaningful change for workers, who continue to face low wages, poor living conditions, and limited rights. Trade unions are weakened, and certification schemes provide limited improvements, exposing the gap between compliance and real impact. The tea value chain's economic imbalance further restricts investments in worker welfare. Without stronger laws enforcing fair wages and accountability, ethical sourcing risks remaining largely symbolic rather than transformative |
| 3.4 | Challenges in Implementation | Structural complexities, high audit costs, weak legal enforcement, and limited worker representation hinder the UK Modern Slavery Act's effectiveness in improving tea supply chain conditions. Without stronger laws, fair |

| | | |
|---|---|---|
| | | auditing, and empowered workers, transparency efforts remain largely symbolic |
| 3.5 | Comparative Analysis of Big Players | This section compares tea companies on ethical sourcing: Twinings and Unilever lead with higher certification rates, living wage initiatives, and better traceability, while Tesco and Aldi show more limited efforts with lower certification and less transparency. Twinings focuses on worker engagement via the TCNA, and Unilever runs a living wage pilot, highlighting varying commitment levels across the industry. |
| 3.6 | MSA Effectiveness | The UK Modern Slavery Act raised corporate transparency and awareness but lacks mandatory due diligence, enforcement, and penalties, limiting its real-world impact. Compared to stricter laws like the EU's CSDDD, the MSA falls short in addressing deeper issues like fair wages and worker empowerment in tea supply chains. |

Table 9. Analysis Summary

Source: Author's own compilation, based on literature cited in this section.

# 4. Discussion

Chapter 3 walked us through the realities of ethical sourcing in the tea sector — from the lived experiences of workers in Assam to the policies and public commitments of major tea companies under the Modern Slavery Act. We saw both progress and deep-seated issues: greater transparency in some cases, but also wages far below living standards, audits that rarely bring lasting change, and laws that stop short of true enforcement.

In this chapter, we take a step back. The goal here is to place those findings into conversation with the academic ideas and models discussed earlier in Chapter 2. Doing so allows us to see more clearly where theory meets reality — and where the two still sit far apart.

### 4.1 Connecting Analysis with Literature Review

The field realities from Chapter 3 echo many of the concerns raised in the literature, but they also expose gaps that academic frameworks sometimes gloss over.

One clear link is with LeBaron and Rühmkorf's (2019)[114] argument that the MSA has been a landmark for corporate transparency yet lacks the teeth to force real change. That gap was visible in the way companies like Tesco and Aldi handle compliance — reports get published, but supplier mapping is incomplete, audits are outsourced, and deeper tiers of the chain remain hidden (Smit et al., 2021)[115]. Our Assam case study makes this shortfall tangible: despite certifications, workers still face low pay, poor housing, and limited ways to voice complaints.

The ethical sourcing models reviewed in Chapter 2, such as Elkington's (1998)[116] triple bottom line, set out an ideal balance between profit, social responsibility, and environmental care. Twinings' Sourced with Care programme or Unilever's living wage pilots nod in this direction, but as Barrientos (2013)[117] warns, certification and CSR branding often fail to address structural inequalities. What we saw in Assam — informal contracts, gendered workloads, and union weakness — mirrors this critique.

[114] LeBaron and Rühmkorf 2019
[115] Smit et al., 2021
[116] Elkington 1998
[117] Barrientos 2013

Gereffi's global value chain framework (2005)[118] is also instructive here. It suggests that lead firms have the power to shape standards throughout the chain, but the comparative analysis in Chapter 3 showed that transparency tends to fade after the first two tiers. This supports Shift's (2022)[119] view that voluntary measures rarely reach the most hidden and vulnerable parts of supply chains without binding rules and real oversight.

In short, the literature helps explain why well-meaning policies often stall in practice, and the findings give those theories a human edge. The MSA and corporate programmes are not meaningless — they've changed the conversation — but they remain too shallow to tackle the deep roots of exploitation in the tea sector.

### 4.2 Business and Supply Chain Implications

The connections drawn in 4.1 show that the distance between policy and practice is not only about weak enforcement — it is shaped by how companies build and run their supply chains. This means that the lessons from the findings are not just for policymakers; they have direct relevance for the way businesses make sourcing decisions, negotiate contracts, and maintain oversight.

In Twinings' case, supplier mapping and targeted community programmes like the TCNA have helped bring worker issues onto the agenda. Yet, as LeBaron and Rühmkorf (2019)[120] argue, initiatives that rely mainly on periodic audits rarely produce long-term change. The accounts from Assam workers — that audits happen without their input and with no visible outcomes — underline this point. For such measures to work, monitoring needs to be a continuous process that incorporates worker feedback as a standard practice, not an optional extra.

Unilever's living wage pilots in Kenya, developed through partnerships like IDH, show what is possible when commercial and social goals are linked (Barrientos, 2013)[121]. These pilots demonstrate that wage improvements and sustainable sourcing can reinforce each other, but they also reveal how fragile progress can be when squeezed by price competition. As Gereffi

[118] framework 2005
[119] Shift's 2022
[120] LeBaron and Rühmkorf 2019
[121] Barrientos, 2013

et al. (2005)[122] note, the distribution of value along the chain determines whether suppliers have the capacity to invest in better labour conditions — and at present, that distribution is rarely in workers' favour.

For retailers such as Tesco and Aldi, their market position gives them considerable influence over supplier practices, yet their current reliance on outsourced audits and limited-tier transparency, as noted by Smit et al. (2021)[123], leaves the deeper, risk-prone parts of the chain largely untouched. Building longer-term supplier relationships and adjusting pricing structures to meet living wage benchmarks would be a step towards making their public commitments meaningful.

The broader implication is that compliance with the Modern Slavery Act should not be treated as a box-ticking exercise. For supply chains to become genuinely ethical, these considerations must influence everyday business decisions — from who gets contracted, to how prices are set, to how progress is monitored over time.

### 4.3 Strengthening the Modern Slavery Act: Lessons from Global Frameworks

The patterns emerging from the earlier chapters leave little doubt: the Modern Slavery Act (MSA) has opened up conversations but hasn't done enough to change day-to-day realities for workers. It works well as a disclosure tool, but not as a driver for real reform. If it is to close the gap between what is written in annual statements and what actually happens in supply chains, it will need a few important changes.

First, the way reporting is handled has to evolve. At present, a company can publish a very short, even vague statement and still be "compliant" (LeBaron & Rühmkorf, 2019)[124]. There is no legal push for them to prove that actual improvements have taken place. Compare this to the EU's Corporate Sustainability Due Diligence Directive (CSDDD), which will make it mandatory to identify problems, prevent them, and take corrective action (Smit et al., 2021)[125]. This is a significant shift from simply talking about risks to actually addressing them — something the UK framework could adopt.

[122] Gereffi et al. (2005)
[123] Smit et al. 2021
[124] LeBaron & Rühmkorf, 2019
[125] Smit et al., 2021

Second, there is the question of enforcement. Right now, the MSA has no dedicated regulator. Most of the time, it's journalists or NGOs that uncover weak compliance. In France, however, the Duty of Vigilance Law has shown that official oversight, with the ability to investigate and penalise, makes a difference (Bright et al., 2020)[126]. The UK could follow a similar model, giving companies clearer expectations while also holding them accountable.

Then comes the economic structure of tea and other agricultural supply chains. As Gereffi et al. (2005)[127] have pointed out, power is often concentrated at the top, with lead firms capturing the largest share of value. This leaves plantations and smallholders with very little room to invest in worker welfare. If policy reform set minimum contract terms, ensured that prices reflected living wage costs, and protected small suppliers from unfair buyer demands, ethical improvements would be far easier to sustain.

Finally, reforms cannot ignore the realities on the ground. In Assam, for example, weak union structures and fear of retaliation mean workers often stay silent. Legal frameworks could require safe, anonymous grievance systems, regular worker consultations, and partnerships with credible local NGOs. These ideas echo the UN Guiding Principles on Business and Human Rights (Ruggie, 2011)[128], which stress that those affected by business decisions should have a say in shaping them.

In short, the MSA has built an important foundation, but it is not enough to just collect and publish statements. Real progress will need stronger legal duties, active oversight, fairer trading terms, and worker voices at the centre of decision-making.

### 4.4 Practical Strategies for Ethical Tea Supply Chains

While stronger laws and policies are essential, they will only work if businesses and supply chain actors have practical ways to put them into action. The tea sector, with its long and complex value chains, needs solutions that can function in very different local realities — from large, mechanised estates in Kenya to smallholder networks in Assam.

[126] Bright et al., 2020
[127] Gereffi et al. 2005
[128] Ruggie, 2011

One starting point is the use of technology to improve traceability. Digital supply chain mapping tools, including blockchain-based systems, can record each transaction from the plantation to the final retailer. This helps close the gaps where exploitation can hide and makes it harder for suppliers to operate in the shadows (Kamilaris et al., 2019)[129]. But technology on its own is not enough — it needs to be paired with training for local managers and smallholders so that data is accurate and regularly updated.

Another important measure is the creation of local grievance systems that workers can trust. These systems should be available in local languages, operate independently from estate management, and guarantee anonymity to protect workers from retaliation. In regions like Assam, where union structures are often weak, partnering with credible local NGOs can give these systems legitimacy and help ensure workers feel safe using them (Oya & Pontara, 2015)[130].

Gender-sensitive auditing is another area where change is overdue. Many tea workers are women, yet standard audits often overlook gender-specific risks such as harassment or unequal pay. Bringing in female auditors, consulting women workers separately, and including gender-based questions in audit checklists can lead to more accurate assessments and targeted improvements (Barrientos, 2014)[131].

Smallholder support is also key. Many certification schemes fail because small farmers cannot afford the high costs of compliance. Brands could share certification costs, provide agronomic training, and offer long-term contracts that give smallholders the financial stability to invest in worker welfare. Without such support, the gap between certified estates and uncertified smallholder farms will persist.

Finally, supply chain reform should be embedded in commercial relationships, not just CSR departments. Procurement teams need to align purchasing practices with ethical commitments — for example, avoiding last-minute order changes that push suppliers into cutting labour costs. This is in line with the Ethical Trading Initiative's guidance that responsible buying is as important as ethical auditing (ETI, 2017)[132].

[129] Kamilaris et al., 2019
[130] Oya & Pontara, 2015
[131] Barrientos, 2014
[132] ETI, 2017

If these strategies are combined — better traceability, trusted grievance channels, gender-aware audits, support for smallholders, and ethical purchasing — the result would be a supply chain that is not just compliant on paper but actively reducing the risks of exploitation in everyday practice.

### 4.5 Research Boundaries and Methodological Limitations

This chapter's arguments rest mainly on **secondary sources**—modern-slavery statements, CSR reports, NGO investigations, news articles, and peer-reviewed studies. That choice was deliberate (it mirrors how most MSA compliance is publicly evidenced), but it also sets boundaries. Secondary data can be partial, strategically framed, or uneven in quality, and it does not replace workers' own accounts gathered through fieldwork (Johnston, 2014). Where possible, I **triangulated** claims—checking a company statement against NGO reporting and academic work—yet agreement across sources still may reflect shared blind spots (LeBaron & Rühmkorf, 2019)[133].

The **geographic focus** is tight: Assam and Kenya carry most of the empirical weight because they are central to the tea economy and recur in modern-slavery debates. That specificity strengthens contextual insight but limits **generalisation** to other origins (e.g., Sri Lanka, Malawi), where labour regimes, union strength, and state capacity differ (Barrientos, 2013)[134]. Even within Assam and Kenya, estates and smallholder networks are highly varied; any synthesis will compress that heterogeneity.

Company disclosures under the MSA are often **descriptive rather than measurable**—few contain time-bound targets, wage benchmarks, or grievance-system outcomes. This makes it difficult to compare performance across firms or to test causality between a policy and on-the-ground change (LeBaron & Rühmkorf, 2019)[135]. Certification data can help, but certification itself is not a proxy for decent work, and audit summaries are rarely public in full (Locke, 2013)[136].

There are **time and language constraints** as well. Policy and corporate practice are moving targets; new due-diligence rules and corporate updates continue to appear. The analysis

[133] LeBaron & Rühmkorf, 2019
[134] Barrientos, 2013
[135] LeBaron & Rühmkorf, 2019
[136] Locke, 2013

reflects the most recent material available during the research window, which means some developments may post-date inclusion. In addition, reliance on English-language sources risks missing local reporting or union documents in regional languages (Johnston, 2014)[137].

Finally, the study sits inside a **global value-chain** lens. That perspective helps explain power and price dynamics but may under-state other drivers—local politics, caste or gender hierarchies, intra-household bargaining—that also shape labour outcomes (Gereffi et al., 2005; Barrientos, 2013)[138]. Recognising these limits does not weaken the findings; it clarifies what they can and cannot claim, and points to where **primary research with workers and supervisors** would add most value.

### 4.6 Future Research Pathways for Transforming Supply Chains

The findings in this study point toward several directions that future research could take to deepen and broaden understanding of how laws like the Modern Slavery Act operate in practice. The first is **primary, worker-centred research**. While secondary sources provide a valuable overview, nothing substitutes for direct interviews and ethnographic work with plantation labourers, smallholder farmers, and supply-chain intermediaries. Hearing from workers in their own words, in their own languages, would fill gaps left by corporate and NGO reporting (Johnston, 2014)[139].

A second opportunity lies in **cross-country, cross-sector comparison**. This study focused on tea in Assam and Kenya, but other agricultural commodities—coffee in Ethiopia, cocoa in Ghana, sugar in Brazil—face similar risks. Comparative studies could help identify which patterns are universal in global value chains and which are shaped by commodity-specific or regional factors (Barrientos, 2013; Gereffi et al., 2005)[140]. Including countries with different legal frameworks, such as France's Duty of Vigilance or Germany's Supply Chain Due Diligence Act, would also allow researchers to test whether stricter laws deliver measurably better outcomes.

**Longitudinal research** is another clear gap. Most modern-slavery statements and NGO investigations offer snapshots in time. Tracking the same estates, communities, or brands

[137] Johnston, 2014
[138] Gereffi et al., 2005; Barrientos, 2013
[139] Johnston, 2014
[140] Barrientos, 2013; Gereffi et al., 2005

over several years would show whether policy changes, certification, or buyer interventions actually lead to sustained improvements—or whether progress stalls after initial publicity (Locke, 2013)[141].

There is also room to examine the role of **technology** more critically. Blockchain, mobile grievance apps, and satellite monitoring are promoted as solutions, but there is limited independent evidence on their actual effectiveness for workers at the bottom of the chain (Kamilaris et al., 2019)[142]. Rigorous impact evaluations could separate marketing claims from tangible benefits.

Finally, future work should link **labour rights to broader sustainability goals**. Climate change, water scarcity, and shifting global demand all affect tea production and labour conditions. Research that integrates human rights due diligence with environmental and economic resilience could help design policies that are both ethical and sustainable in the long run (Barrientos, 2014)[143].

By building on these areas, future scholarship can move beyond compliance checklists to explore what genuinely transforms supply chains—keeping the focus on the workers whose lives these laws are meant to improve.

### 4.7 Interim Summary

| | | |
|---|---|---|
| 4.1 | Gaps Between Policy Promises and Supply Chain Realities | Field evidence from Assam shows that while the MSA and corporate programmes like certifications or CSR improve transparency, they lack enforcement and fail to address deeper supply chain issues such as hidden tiers, poor wages, and weak worker voice. Literature from LeBaron & Rühmkorf, Barrientos, and Gereffi echoes this, highlighting that voluntary models shift discourse but remain |

[141] Locke, 2013
[142] Kamilaris et al., 2019
[143] Barrientos, 2014

| | | |
|---|---|---|
| | | too shallow to tackle structural exploitation. |
| 4.2 | From Compliance to Practice: Business Decisions and Worker Outcomes | The Assam findings show that weak enforcement isn't the only issue — company sourcing choices, contracts, and oversight practices shape outcomes. While initiatives like Twinings' TCNA and Unilever's living wage pilots show potential, reliance on audits, price pressure, and shallow transparency (Tesco, Aldi) limit impact; genuine progress requires fairer value distribution, long-term supplier ties, and continuous worker-centred monitoring beyond MSA box-ticking. |
| 4.3 | **Strengthening the MSA** | The MSA has raised awareness but lacks depth — weak reporting rules, no regulator, and little accountability mean real change is rare. Lessons from the EU and France show stronger legal duties and enforcement work, while fairer contract terms, living wage pricing, and worker voice mechanisms are vital to make supply chains genuinely ethical. |
| 4.4 | Practical Strategies for Ethical Tea Supply Chains | Stronger laws must be matched with practical tools: digital traceability, trusted grievance systems, and gender-sensitive audits can expose hidden risks. Supporting smallholders with training, shared certification costs, |

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|---|---|---|
| | | and stable contracts, alongside ethical buying practices, ensures supply chains move beyond paper compliance toward real worker protection. |
| 4.5 | Research Limitations | This study relies mainly on secondary sources, offering valuable insights but with limits such as partial data, firm-controlled narratives, and lack of worker voices. Its focus on Assam and Kenya gives depth but restricts generalisation, while challenges like vague MSA disclosures, language gaps, and the global value-chain lens highlight the need for future primary research to capture local realities more fully. |
| 4.6 | Future Research Scope | Future research should prioritise worker-centred fieldwork, cross-country and cross-commodity comparisons, and longitudinal studies to track real change beyond compliance snapshots. It should also critically assess technology's effectiveness and connect labour rights with broader sustainability goals, ensuring supply chain reforms genuinely improve workers' lives. |

Table 10. Discussion Summary
Source: Author's own compilation, based on literature cited in this section.

# 5. Recommendations

The previous chapters showed us where the system stands today: the Modern Slavery Act (MSA) has created awareness, companies have taken some steps, and yet the lived reality of workers in Assam, Kenya, and other tea regions continues to lag behind policy promises. Chapter 4 discussed these gaps in detail, but discussion alone cannot drive change. For that, clear and practical actions are needed.

This chapter focuses on those actions. It is not about repeating the problems, but about putting forward realistic steps that governments, companies, and worker organisations can take. The goal is simple: to move from identifying barriers to creating solutions that can reshape tea supply chains into something more transparent and fairer.

### 5.1 Policy-Level Reforms for Ethical Supply Chains

The Modern Slavery Act was meant to push companies towards more responsible practices, but our analysis shows that its impact has been uneven. On paper, most firms publish statements and list policies, yet in practice many of these reports are too general and carry little weight. The core issue is not the absence of rules but the weakness of enforcement.

A stronger system would require two basic changes. First, company reports should not just be uploaded and forgotten; they need to be reviewed by an independent body. If a business fails to provide enough detail or is found misleading, there should be real penalties such as fines or restrictions on access to public contracts. This would prevent the current “tick-box” approach that has become common.

Second, the UK framework should not stand alone. Tea supply chains stretch across India, Kenya, and other regions. Without some kind of alignment with broader international standards—such as the UN Guiding Principles on Business and Human Rights or the new EU directives—companies will continue to face fragmented requirements, and workers will continue to be left behind. Common standards would make expectations clearer and easier to enforce.

Finally, reforms also need to recognise that modern slavery is not a domestic issue alone. Joint cooperation between the UK and producing countries could make inspections more effective and close the gaps that currently allow abuses to go unchecked. Shared

investigations, information exchange, and even cross-border penalties could build the kind of accountability that today is missing.

### 5.2 Corporate Actions for Responsible Sourcing

Even with stronger laws in place, companies themselves carry a major share of responsibility for shaping ethical supply chains. What we saw in the case study is that many firms focus heavily on audits and glossy statements, but workers rarely feel the impact of these efforts. If change is to be real, corporate action must go beyond compliance and address the deeper issues of transparency, wages, and worker voice.

The first area is transparency. Publishing supplier lists is an important step, but it often stops at the first tier. Tea supply chains are complex, involving not only estates but also smallholders and intermediaries who rarely come into view. Mapping these hidden layers would allow companies to identify the points of highest risk, rather than limiting attention to the estates already under scrutiny.

The second area concerns wages. In regions such as Assam, the gap between legal wages and living wages remains stark. Experiments like Unilever's living wage pilots show that improvement is possible but scaling them requires commitment from buyers. Unless brands are willing to adjust contracts and pay higher prices, suppliers will remain unable to raise wages sustainably. This means that ethical sourcing cannot only be about certification—it has to involve fairer trade terms.

The third area is monitoring. Current audit systems are too costly, infrequent, and often geared towards satisfying certification requirements. A more effective system would combine lighter, regular checks with accessible grievance channels for workers themselves. By shifting the focus from management paperwork to direct worker feedback, companies can make oversight more credible and responsive.

### 5.3 Civil Society and Worker Empowerment

Change in supply chains cannot happen through laws and companies alone. Workers and the organisations that support them are just as important. What we saw in Assam makes this clear: unions like the ACMS exist, but their influence has been reduced by politics and pressure from estate managers. As a result, many workers feel they have no real voice.

Here, civil society has a major role. Local NGOs and community groups often understand workers' daily struggles better than distant auditors or certification schemes. If these groups

are given proper resources and recognition, they can strengthen worker voices and bring local issues to light more effectively.

Awareness is another gap. Many tea workers do not know their basic rights or are unsure how to raise complaints safely. Even when formal systems exist, fear of retaliation often silences them. This is where unions and NGOs can help—by building trust, running awareness campaigns, and making grievance systems easier to access.

Empowerment also means direct involvement. Too often, audits and community projects are designed without consulting the workers they are supposed to benefit. Setting up worker-led committees and feedback groups would allow them to take part in decisions. When workers are treated as participants rather than passive recipients, reforms stand a far better chance of lasting.

### 5.4 Technology and Innovation for Transparency

Old methods like paper audits and certification visits have shown their limits. They are costly, happen only once in a while, and often miss what workers actually go through every day. To move forward, supply chains need tools that make information more open and harder to ignore.

One option is digital tracking. With systems such as blockchain, tea can be followed from the estate to the supermarket shelf. This makes it more difficult for poor labour practices to be hidden and gives companies a clearer picture of where risks exist. Some trials in agriculture suggest that this kind of tracking can work without putting too much cost on small farmers.

Technology can also give workers a voice. Even something as simple as an SMS helpline or a reporting app in the local language could allow them to raise complaints safely. When supported by NGOs or unions, these tools can reach workers who are often left out of traditional audit processes.

Innovation is not only about digital tools. It can also mean involving workers directly in collecting and sharing information. Regular surveys, small focus groups, or worker-led monitoring can show problems much earlier than distant inspections. If companies combine these local insights with digital systems, transparency will be both wider and more grounded in workers' reality.

| Actor | Action | Timeline |
|---|---|---|
| UK Government | Introduce digital reporting standards under MSA | By 2027 |
| Twinings | Publish estate-level supplier maps online | By 2026 |
| Unilever | Expand digital traceability pilots to all Kenyan estates | Pilot 2025 |
| NGOs in Assam | Launch mobile grievance app in local languages | 2025–2026 |
| Worker Unions | Run training on digital tools for workers | Continuous |

Table 11. Implementation Roadmap for Technology and Innovation
Source: Author's own compilation

### 5.5 Priority Actions and Phasing

Big changes in tea supply chains cannot happen overnight. Some improvements are easier and faster, while others demand time, money, and stronger institutions. Thinking in phases makes it clear what can be done now and what will take longer.

**Short-term actions** are the ones that can show impact quickly. For instance, estates can focus on repairing housing and sanitation, buyers like Twinings or Unilever can publish clearer supplier lists, and NGOs can test simple tools such as mobile grievance systems. These are not expensive steps, but they help workers see that promises are being followed by visible results.

**Medium-term steps** need a bit more planning and coordination. This might include expanding digital traceability pilots to cover more estates, building training programs so worker committees gain confidence, or making certification schemes more consistent. Such actions cannot happen instantly but can be achieved within a few years if actors work together.

**Long-term reforms** deal with the roots of inequality. Ensuring living wages through stronger wage laws, rebuilding independent unions, or changing how profits are shared across the value chain are all examples. These are complex, political, and slow-moving, but without them, the smaller fixes will not last.

By looking at reforms in this way—short, medium, and long-term—it becomes possible to balance urgency with patience. Quick gains can create trust, while deeper reforms keep the

system from sliding back. Both are necessary if ethical sourcing is to move beyond surface change.

### 5.6 Interim Summary

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|---|---|---|
| 5.1 | Policy Reforms | The Modern Slavery Act has led many companies to publish reports, but most are vague and lack real impact due to weak enforcement. Stronger accountability—through independent review, penalties for non-compliance, alignment with international standards, and cross-border cooperation—is needed to make corporate action effective and protect workers in global supply chains. |
| 5.2 | Corporate Responsibility | Companies must move beyond audits and compliance to build ethical supply chains that genuinely improve workers' lives. Key priorities are deeper transparency across all supplier tiers, fairer wages through adjusted trade terms, and worker-centered monitoring systems that emphasize direct feedback over paperwork. |
| 5.3 | Worker Empowerment | Sustainable supply chain reform requires empowering workers and strengthening their voice through unions, NGOs, and community groups. Greater awareness of rights, safer grievance systems, and worker-led participation are |

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| | | key to making changes more effective and lasting. |
| 5.4 | Tech for Transparency | Traditional audits fall short, so supply chains need more transparent and worker-centered tools. Digital tracking, mobile reporting systems, and worker-led monitoring can expose risks earlier, amplify worker voices, and create more reliable accountability. |
| 5.5 | Action Roadmap | Reforming tea supply chains requires a phased approach: quick wins like better housing, transparency, and grievance tools; medium-term steps such as digital traceability and worker training; and long-term reforms on wages, unions, and profit-sharing. Balancing short-term impact with deeper structural change is key to lasting ethical sourcing. |

Table 12. Recommendations Summary
Source: Author's own compilation

# 6. Outlook

This chapter brings the thesis to its close. The earlier sections examined laws, company responses, and the lived realities of workers. Now the task is to step back and reflect on what all this means together. Rather than adding new evidence, this part draws the threads into a bigger picture and considers what lessons can be taken forward.

### 6.1 What the Study Has Shown

The Modern Slavery Act set out to make companies more responsible for what happens in their supply chains. In many ways, it has done so. Firms are now expected to publish annual statements, map their suppliers, and speak openly about risks. Awareness has clearly grown.

Yet the evidence in this thesis shows that awareness does not always mean real change. In Assam, tea workers continue to live with low wages, poor housing, and weak access to grievance systems. Twinings has taken steps through audits and community projects, but the gap between policy and daily reality remains.

The comparison with other companies underlined this point. Unilever has experimented with living wage pilots, while retailers such as Tesco and Aldi have relied more heavily on standard audits. Each approach has limits. Certifications or statements often look good on paper but do not always shift conditions on estates.

The wider discussion pointed to why this happens. Tea supply chains are long and fragmented, making control difficult. Certification schemes are costly and uneven. Trade unions are politically constrained. And above all, the MSA itself does not enforce penalties on firms that report poorly.

The recommendations in Chapter 5 built on these insights. They showed that solutions are possible if shared responsibility is taken seriously—whether through clearer laws, stronger business practices, or greater worker voice. Practical steps, from phased timelines to role-specific actions, were outlined to make progress achievable.

### 6.2 What This Study Adds

This thesis adds to knowledge in a few clear ways. The first is by showing how the Modern Slavery Act looks when applied in practice, not just in policy. Many papers talk about the law in general terms, but here the focus was on the tea industry in Assam. By connecting what companies publish in their statements with what workers actually experience, the study shows where the gaps really are.

A second contribution comes from comparing different kinds of companies. Looking at Twinings, Unilever, Tesco, and Aldi side by side makes it clear that not all firms respond in the same way. Some go further, trying out wage pilots or publishing supplier maps, while others stop at basic reporting. This contrast helps us see the Act's uneven impact.

Finally, the research adds value by bringing different sources together. Company statements, NGO reports, and academic studies were all read together, which gave a fuller picture than relying on only one type of material. It helped trace how promises on paper often look very different from realities on the ground.

Overall, the study does not claim to create a new theory. Its contribution lies in drawing a sharper line between what is said in London boardrooms and what is felt in Assam tea estates. That connection is important, because it shows that judging a law like the MSA requires attention to both corporate compliance and worker realities.

### 6.3 Limitations of the Study

No research is ever perfect, and this thesis also has its boundaries. The first limitation comes from its focus. The study has looked closely at the tea industry, especially Assam and a few well-known international brands. This choice allowed for a deep dive, but it also means the findings cannot be stretched too far beyond this sector. Other industries like garments or electronics may face similar issues, yet they were not part of this work.

The second limitation is about the kind of data used. Most of the analysis is built on secondary sources — NGO reports, company statements, and published studies. These are important, but they also carry the views and filters of those who produced them. Direct voices of workers, which could have added richer detail, were not part of the material here. That is a gap worth noting.

A third limit is time. Laws such as the Modern Slavery Act are still developing, and global supply chains continue to shift. What is true today may look different a few years from now. This thesis, therefore, captures a moment in that ongoing process, not a permanent conclusion.

Recognising these limits does not weaken the study. Instead, it helps place the findings in the right frame — useful and relevant, but not universal or final.

### 6.4 Future Research Scope

Like any study, this work opens up new questions that could not be covered here. One clear step for future research is to include the direct voices of workers. Talking to them through interviews or surveys would add details that reports, and company statements alone cannot show. Their own experiences would make the picture more complete.

Another step is to look beyond tea. This thesis has focused on one sector, but other industries like garments, cocoa, or electronics also face risks of forced labour. Comparing across these sectors could show whether the issues seen here are specific to tea or part of a larger pattern in global supply chains.

There is also scoped to study the role of technology. New tools such as digital traceability or grievance apps are being tried, but we do not yet know how far they actually help workers. Future studies could test these tools in practice and judge their real impact.

Lastly, research that follows the same estates or companies over a longer period would be valuable. Modern slavery is not solved in a single year, and only long-term tracking can reveal if reforms last or fade away.

In short, future research can move in four directions: closer to workers, wider across industries, deeper into technology, and longer over time. Together, these paths can build on what this study has started.

### 6.5 Conclusion

This thesis set out with a clear question: *How can the tea industry develop a sustainable sourcing model that addresses labor exploitation and ensures compliance with the Modern*

*Slavery Act (MSA)?* From the beginning, each chapter has slowly built the answer. Chapter 1 and 2 gave the background and showed what the law and the existing literature say. Chapter 3 went deep into the ground realities through the Assam case study and a wider look at global supply chains. Chapter 4 discussed why the law, and corporate responses often fall short when they meet these complex realities. Chapter 5 then moved the conversation forward by suggesting practical ways companies, policymakers, and communities can do better.
Across this journey, three big lessons stand out. First, laws like the MSA can raise awareness and create pressure, but without proper enforcement they risk becoming more about reporting than real change. Second, business-led efforts like audits, certifications, or small CSR projects may look good on paper, yet they rarely touch the deeper problems of low wages, poor housing, or weak worker representation. Third, lasting progress will only come when responsibility is shared — governments must strengthen the rules, companies must go beyond compliance, and workers and communities must have a stronger voice.

Bringing these threads together, this research suggests a **Sustainable Sourcing Model for the Tea Industry** (see Figure 6.1). The model rests on three pillars:

1. **Law and Policy Reform** – stronger enforcement and alignment with global standards.
2. **Corporate Practice** – living wages, supplier transparency, and real grievance systems.
3. **Worker and Community Power** – active participation of workers, stronger unions, and NGO involvement to keep checks in place.

This model acts as a bridge between what has been discussed and what still needs to be done.

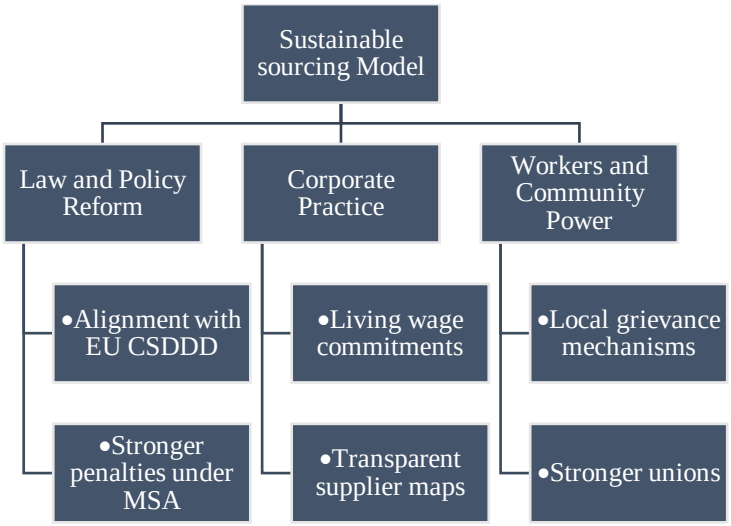


Figure 10. Three-Pillar Sustainable Sourcing Model for the Tea Industry
Source: Author's own compilation

As Figure 10 illustrates, sustainable sourcing in the tea industry requires a balance between legal frameworks, corporate responsibility, and empowerment of workers. Each pillar reinforces the others, ensuring that compliance with the Modern Slavery Act translates into real improvements on the ground.

The three-pillar model shows that no single effort can solve the challenges in the tea industry. Laws such as the Modern Slavery Act set the direction, but without active steps from companies and real involvement of workers, the law remains only on paper. At the same time, company programmes alone cannot succeed if workers do not have a voice or if governments do not enforce basic standards. Each pillar relies on the other, and it is their balance that makes change possible.

In simple terms, the industry now has to move beyond promises. Ethical sourcing cannot just be about audits or reports written for compliance. It needs to become part of how tea is produced, traded, and consumed every day. The Act has helped to start this shift, but the real test lies in how far companies and governments are willing to turn these words into practice. The recommendations and the model presented in this thesis give one possible path to take that step forward.

## 6.6 Interim Summary

| | | |
|---|---|---|
| 6.1 | Key Findings | The Modern Slavery Act has increased corporate awareness of supply chain risks, but in practice, tea workers in Assam still face low wages, poor living conditions, and weak grievance systems. Fragmented supply chains, limited enforcement, and ineffective audits mean real change is slow, highlighting the need for shared responsibility through stronger laws, better business practices, and empowered worker voices. |
| 6.2 | Study Contributions | This thesis highlights the gap between the Modern Slavery Act's intentions and real-world impact in Assam's tea industry, showing how company statements often differ from workers' experiences. By comparing firms and combining multiple data sources, it reveals the Act's uneven effects and emphasizes the need to assess both corporate compliance and worker realities. |
| 6.3 | Limitations | This thesis has limitations: it focuses only on Assam's tea industry and a few brands, relies mainly on secondary sources rather than direct worker voices, and reflects a specific moment in time as laws and supply chains |

| | | |
|---|---|---|
| | | evolve. These boundaries mean the findings are insightful but not universally generalizable or final. |
| 6.4 | Future Directions | Future research should focus on directly engaging workers, expanding beyond the tea sector, evaluating technology like digital traceability and grievance apps, and tracking reforms over time. These steps would provide a fuller, more practical understanding of modern slavery and supply chain impacts. |
| 6.5 | Conclusion | This thesis shows that sustainable sourcing in the tea industry requires a **three-pillar approach**: stronger law enforcement and global alignment, corporate practices like living wages and transparency, and empowered workers and communities. Real change goes beyond audits or reports, relying on shared responsibility between governments, companies, and workers to turn compliance into meaningful, everyday improvements. |

Table 13. Outlook Summary
Source: Author's own compilation

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# Appendix A: Five-Pillar Extended Model for Sustainable Tea Sourcing

In Chapter 6.5, the thesis introduced a three-pillar model that explained how sustainable tea sourcing can be built on legal reform, corporate practices, and worker participation. While that framework captures the essence of the argument, many discussions in the literature and industry reports suggest that a broader view is necessary. For that reason, this appendix develops a five-pillar version of the model.

The aim here is not to complicate the earlier framework but to show how other dimensions — such as community development and environmental sustainability — are closely tied to labour rights and ethical sourcing. By adding these, the model becomes more practical and forward-looking for the tea industry.

**The Five Pillars**

1. **Ethical Compliance** – keeping companies accountable under the Modern Slavery Act and aligning with international human rights standards.
2. **Fair Labour Practices** – ensuring workers earn a living wage, have safe housing, and access proper grievance systems.
3. **Supply Chain Transparency** – improving traceability through supplier mapping and digital monitoring tools.
4. **Community Development** – supporting health, education, and gender-inclusive programs in tea-growing regions.
5. **Environmental Sustainability** – adopting climate-smart farming and protecting biodiversity to secure the future of tea production.

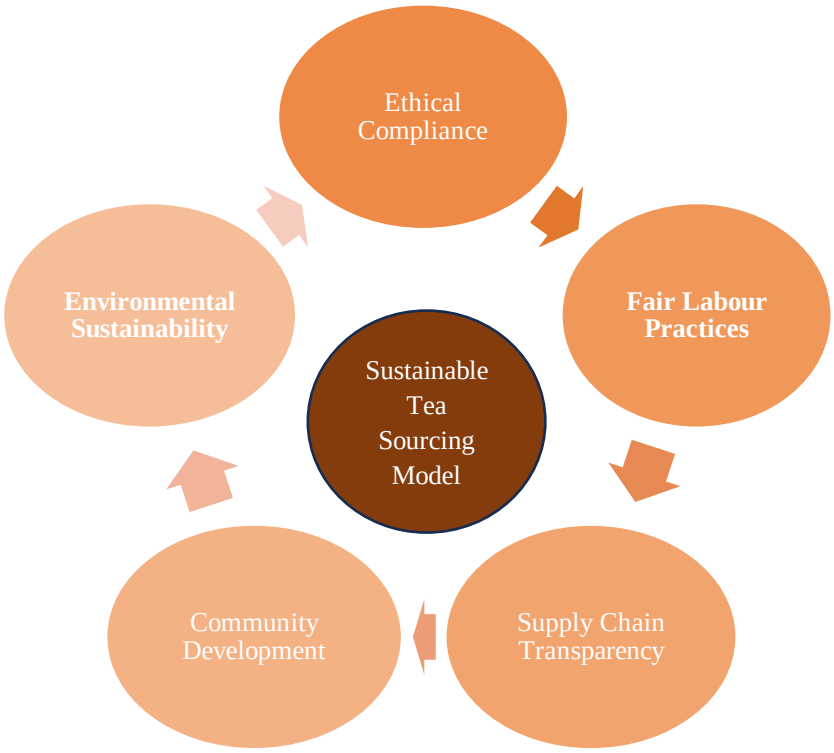


Figure 11. Five-Pillar Extended Model for Sustainable Tea Sourcing
Source: Author's own compilation

This figure shows the proposed five-pillar sustainability model designed for the tea industry. To provide further clarity, the supporting table below expands on each pillar with its focus areas and practical examples.

## Supporting details of the Three-Pillar Sustainability Model

| Pillar | Key Actions | Intended Outcome |
|---|---|---|
| Ethical Compliance | Enforce Modern Slavery Act reporting; align with UNGPs | Stronger corporate accountability |
| Fair Labour Practices | Living wage implementation; safe housing; worker grievance redressal | Improved working and living conditions |
| Supply Chain Transparency | Supplier mapping; blockchain/digital tracking | Traceable and ethical sourcing network |
| Community Development | Health and education projects; gender-inclusive initiatives | Stronger, more resilient local communities |
| Environmental Sustainability | Climate-smart farming; biodiversity protection; waste reduction | Long-term ecological balance for tea production |

Table 14. Key Actions and Outcomes under the Five-Pillar Framework
Source: Author's own compilation

## How to Read This Model

This extended framework sits alongside the three-pillar model used in the main text. The three-pillar version is kept simple to highlight the direct connection between the Modern Slavery Act and worker protection. The five-pillar version, presented here, shows the bigger picture: that social, economic, and environmental factors are all interdependent. Policymakers, companies, and NGOs can therefore use this model as a long-term roadmap while applying the three-pillar model for immediate reforms.

# 8. Declaration of Authenticity

I certify that this thesis does not incorporate without acknowledgement any material previously submitted for a degree or diploma in any university; and that to the best of my knowledge and belief it does not contain any material previously published or written by another person where due reference is not made in the text.

Hof, 05.09.2025 SOHAM GANDHI

Signature